

## **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
2801 West Old Route 30  
Warsaw, Indiana 46581-0837**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T085-6040-00009	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: August 5, 2002  Expiration Date: August 5, 2007

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a publication rotogravure printing operation.

Responsible Official:	Grant McGuire
Source Address:	2801 West Old Route 30, Warsaw Indiana 46581-0837
Mailing Address:	Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581
General Source Phone No.	(219) 267-7101
SIC Code:	2754
County Location:	Kosciusko
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major, under PSD Rules; Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) Four (4) natural gas or No. 2 or No. 6 oil fired boilers described as follows:
  - (1) B1 and B2, installed in July of 1971 and October 1979, respectively, each with a maximum rated capacity of 85 MMBtu/hr,
  - (2) B3, installed in October of 1979, with a maximum rated capacity of 78 MMBtu/hr,
  - (3) B4, installed in June of 1994, with a maximum rated capacity of 98.4 MMBtu/hr.
- (b) Fourteen (14) publication rotogravure printing presses, each using a carbon adsorption solvent recovery system with seventeen (17) adsorbers as control, described as follows:
  - (1) WR-429, installed in September of 1985, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute, and enclosed by permanent total enclosure (PTE),
  - (2) WRO-486, installed in December of 1970, with a maximum printing width of 69 inches and a maximum line speed of 1600 feet per minute,
  - (3) WRO-487, installed in December of 1971, with a maximum printing width of 69 inches and a maximum line speed of 2000 feet per minute,
  - (4) WRO-488 and WRO-489, installed in March of 1979 and September of 1978, respectively, with each press having a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute,
  - (5) WRO-490, installed in July of 1990, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2756 feet per minute,

- (6) WRO-491, and WRO-492, and WRO-493 and WRO-494, not yet installed, with each press having a maximum printing width of 125 inches and a maximum line speed of 3000 feet per minute, and enclosed by permanent total enclosure (PTE). WRO-493 and WRO-494 are pre-approved presses at the time of this permit issuance under Construction Permit PSD/CP085-4396-00009,
- (7) WR-444, installed in December of 1996, with a maximum printing width of 78 3/4 inches and a maximum line speed of 2450 feet per minute, and, although not required by rule, enclosed by permanent total enclosure (PTE),
- (8) WR-441, WR-442, WR-443, installed in December of 1996, with each press having a maximum printing width of 78 3/4 inches and a maximum line speed of 2450 feet per minute, and enclosed by permanent total enclosure (PTE),
- (c) Three (3) rotogravure proof presses, using the carbon adsorption solvent recovery system described above as control, described as follows:
  - (1) WCM-440, with a maximum printing width of 73 inches and a maximum line speed of 400 feet per minute,
  - (2) WCM-450, installed in September of 1994, with a maximum printing width of 125 inches and a maximum line speed of 900 feet per minute,
  - (3) WCM-460, installed in December of 1993, with a maximum printing width of 78 7/8 inches and a maximum line speed of 600 feet per minute,
- (d) One (1) gravure cylinder wash machine, identified as GCW, installed in April of 1995, located in the east plant.
- (e) One (1) gravure parts press parts washer, identified as GPW, installed in 1991, located in the east plant.
- (f) One (1) gravure cylinder wash machine, identified as WCWM, installed in May of 2000, located in the west plant, using the carbon adsorption solvent recovery system and enclosed by permanent total enclosure (PTE).
- (g) One (1) gravure press parts washer, identified as WGPW, installed in May of 2000, located in the west plant, enclosed by permanent total enclosure (PTE).
- (h) Two (2) chromium plating lines, CRT-1 and CRT-2, installed in September of 1994, using a composite mesh pad system with a hepafilter as control, each having two (2) rectifiers with a maximum combined capacity of 10,000 amps,
- (i) One (1) pneumatic dust and paper trim collection system located in the east plant and consisting of:
  - (1) One (1) cyclone, identified as EPC-3, installed in May of 1994, exhausting to one (1) baghouse, identified as EPBH-C, installed in June of 1994,
  - (2) One (1) cyclone, identified as EPC-1, installed in 1978,
  - (3) One (1) cyclone, identified as EPC-2, installed in 1978,
  - (4) One (1) cyclone concentrator, identified as EPCON-5, installed in June of 1995, with concentrated paper sent to cyclone, EPC-1, EPC-2, and EPC-3, exhausting to one (1) baghouse, EPBH-E, installed in June of 1995,

- (5) Three (3) baghouses, identified as EPBH-C, EPBH-D, installed in June of 1994, and EPBH-E, with collected dust sent to one (1) dust auger, silo, and baghouse (EPBH-F) system (identified as an insignificant activity),
- (6) One (1) cyclone concentrator, identified as EPCON-6, with concentrated dust sent to one (1) cyclone, EPC-4, installed in May of 1994, or to one (1) cyclone concentrator, EPCON-5, with air exhausting to one (1) baghouse, EPBH-E,
- (7) One (1) cyclone, identified as EPC-4, with concentrated dust sent to one (1) dust auger, silo, and baghouse (EPBH-F) system (identified as an insignificant activity) with air exhausting to one (1) baghouse, EPBH-D,
- (j) One (1) pneumatic paper trim collection system located in the west plant and consisting of:
  - (1) One (1) cyclone, identified as WPC-1, installed in June of 1969,
  - (2) One (1) cyclone, identified as WPC-2, installed in June of 1969,
  - (3) One (1) cyclone concentrator, identified as WPCON-3, installed in August of 1993, modified in June 2002, with concentrated paper sent primarily to a cyclone, WPC-1 or secondarily to WPC-2, exhausting to one (1) baghouse, WPBH, installed in August of 1993,
  - (4) One (1) baghouse, identified as WPBH, with collected dust sent to cyclone, WPC-1 or WPC-2, with air exhausting to the bindery,
  - (5) One (1) cyclone concentrator, identified as WPCON-4, installed in August of 1993, modified June 2002, which has a maximum capacity of 10,500 pounds per hour, with concentrated paper sent primarily to cyclone WPC-1, or secondarily to WPC-2,
  - (6) One (1) cyclone concentrator, identified as WPCON-5, installed in June 2002, which has a maximum capacity of 10,500 pounds per hour, with concentrated paper sent primarily to cyclone WPC-1, or secondarily to WPC-2.
- (k) Six (6) cylinder making finishing sinks located in the east plant, identified as EPFS-1 through EPFS-6, installed in September of 1994,
- (l) One (1) wastewater treatment system located in the east plant and consisting of:
  - (1) One (1) 3000 gallon solvent/water separator, identified as WWT-1, installed in 1996,
  - (2) One (1) 1000 gallon solvent/water separator, identified as WWT-2, installed in 1985,
  - (3) One (1) 17,800 gallon air sparging tank, identified as WWT-3, installed in 1985.
- (m) One (1) cylinder making finishing sink station located in the west plant, identified as WPFS-1, installed in April of 1990,
- (n) Thirty-seven (37) storage tanks, installed in dates ranging from 1960 through 1989, (specific dates are discussed in the Technical Support Document).

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements. All insignificant activities are listed in the attached Technical Support Document.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5]

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This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

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Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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This permit does not convey any property rights of any sort or any exclusive privilege.

### B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

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- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may

assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a

reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.12 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

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- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the

information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
**[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;

- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered as an application form, report, or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at

least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

## **Testing Requirements [326 IAC 2-7-6(1)]**

### **C.9 Performance Testing [326 IAC 3-6]**

- 
- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

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##### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

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##### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, and maintained on site, and is comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current

Compliance Response Plan; or

- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
- (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed at all times when the equipment emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of

the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

##### **C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

**C.22 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

Four (4) natural gas or No. 2 or No. 6 oil fired boilers with emissions, described as follows:

- (a) B1 and B2, installed in July of 1971 and October 1979, respectively, each with a maximum rated capacity of 85 MMBtu/hr,
- (b) B3, installed in October of 1979, with a maximum rated capacity of 78 MMBtu/hr,
- (c) B4, installed in June of 1994, with a maximum rated capacity of 98.4 MMBtu/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2]

- (a) Pursuant to 326 IAC 6-2-3 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (c)), particulate emissions from boilers B1, B2, and B3 shall be limited to 0.8, 0.34, and 0.34 pounds of particulate matter per MM Btu of heat input, respectively, by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

- where
- Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input;
  - C = maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) for a period not to exceed a sixty (60) minute time period;
  - Q = total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input;
  - N = number of stacks in fuel burning operation;
  - a = plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input; and
  - h = stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows.

- (b) Pursuant to 326 IAC 6-2-4 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from boiler B4 shall be limited to 0.24 pounds of PM per MM Btu by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

- where
- Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
  - Q = total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

#### D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations), the SO<sub>2</sub> emissions from the ninety-eight

and four-tenths (98.4) MMBtu per hour boiler B4 shall not exceed five tenths (0.5) pounds per million Btu heat input when burning distillate fuel oil.

**D.1.3 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1]**

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Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations) the SO<sub>2</sub> emissions from the seventy-eight (78) MMBtu per hour and the two (2) eighty-five (85) MMBtu per hour oil-fueled boilers identified as B1, B2, and B3, respectively, shall not exceed five-tenths (0.5) pounds per MMBtu heat input when burning distillate oil, or one and six-tenths (1.6) pounds per MMBtu heat input when burning residual oil.

**D.1.4 NSPS for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60, Subpart Dc] [326 IAC 12]**

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Boiler B4 has a capacity greater than 10 MMBtu per hour and was constructed after the NSPS applicability date of June 9, 1989, therefore, it is subject to this NSPS. Pursuant to this rule, the sulfur dioxide emissions from boiler B4 shall be limited to 0.5 pounds per million Btu of heat input. Boiler B4 shall be deemed in compliance with this rule when using either natural gas or No. 2 distillate fuel oil containing not in excess of 0.5% sulfur. No gases discharged from Boiler B4 shall exhibit greater than 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity.

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

**D.1.5 Sulfur Dioxide (SO<sub>2</sub>) and Oxides of Nitrogen (NO<sub>x</sub>) PSD Synthetic Minor Limitations [326 IAC 2-2][40 CFR 52.21]**

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This source is a major PSD source and boilers B1, B2, B3, and B4 shall have the following SO<sub>2</sub> limits:

- (a) for boilers B1 and B2;
  - (1) 0.5 lb of SO<sub>2</sub> per MM Btu for distillate oil combustion.
  - (2) 1.6 lb of SO<sub>2</sub> per MM Btu for residual oil combustion.
  - (3) combined SO<sub>2</sub> emissions from B1 and B2 shall not exceed 245 tons per rolling 12 month average.  $3\{[(B1 \text{ No. 6 fuel oil usage per month} + B2 \text{ No. 6 fuel oil usage per month}) * (SO_2 \text{ EF (emission factor) for No. 6 fuel})] + [(B1 \text{ No. 2 fuel oil usage per month} + B2 \text{ No. 2 fuel oil usage per month}) * (SO_2 \text{ EF for No. 2 fuel})]\} \# \text{ an average of 245 tons per 12 consecutive month period rolled on a monthly basis, where the EF for No. 6 fuel and the EF for No.2 fuel shall be based on the sulfur content of the fuel burned and the AP-42 emission factors for boilers of less than 100 MMBtu/hr from Table 1.3-1 of AP-42 updated September 1998.}$
- (b) for boiler B4;
  - (1) No. 2 fuel oil consumption not to exceed a rolling 12 month average of 516 kgal per month with a sulfur content not to exceed 0.5%, and
  - (2) rolling 12 month average of 318 kgal of No. 6 fuel oil per month at a 1.6% sulfur content, and
  - (3) natural gas consumption not to exceed a rolling 12 month average of 72 million cubic feet per month.

**D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the boilers.

## Compliance Determination Requirements

### D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the SO<sub>2</sub> and PM limits specified in Conditions D.1.1, D.1.2, D.1.3, and D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### D.1.8 Sulfur Dioxide Emissions and Sulfur Content

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Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance for:

- (1) the ninety-eight and four-tenths (98.4) MMBtu per hour boiler B4 utilizing one of the following options:
  - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
  - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
    - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
    - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (2) the two (2) 85 MMBtu per hour boilers, B1 and B2, and the one (1) 78 MMBtu per hour oil-fueled boiler B3 are not subject to the requirements of 40 CFR Dc, because they were constructed before the applicability date of the rule (June 9, 1989).

## Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

### D.1.9 Visible Emissions Notations

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- (a) The Permittee will conduct one visible emission notation during normal operations at least once per week for each week during which the respective boiler is operated. A trained employee or other trained observer shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee or observer is someone who has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

## Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

### D.1.10 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.2, D.1.3, D.1.4, and D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40

CFR 60 Subpart Dc and 326 IAC 7-1.1-1, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.9, the Permittee shall maintain records of the visible emission notations of the boilers stack exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.4 and D.1.5, and the natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) Fourteen (14) publication rotogravure printing presses, each using a carbon adsorption solvent recovery system with seventeen (17) adsorbers as control, described as follows:
- (1) WR-429, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute, and enclosed by permanent total enclosure (PTE),
  - (2) WRO-486, with a maximum printing width of 69 inches and a maximum line speed of 1600 feet per minute,
  - (3) WRO-487, with a maximum printing width of 69 inches and a maximum line speed of 2000 feet per minute,
  - (4) WRO-488 and WRO-489, with each press having a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute,
  - (5) WRO-490, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2756 feet per minute,
  - (6) WRO-491, and WRO-492, and WRO-493 and WRO-494, not yet installed, with each press having a maximum printing width of 125 inches and a maximum line speed of 3000 feet per minute, and enclosed by permanent total enclosure (PTE). WRO-493 and WRO-494 are pre-approved presses at the time of this permit issuance under Construction Permit PSD/CP085-4396-00009,
  - (7) WR-444, installed in December of 1996, with a maximum printing width of 78 3/4 inches and a maximum line speed of 2450 feet per minute, and, although not required by rule, enclosed by permanent total enclosure (PTE),
  - (8) WR-441, WR-442, WR-443, installed in December of 1996, with each press having a maximum printing width of 78 3/4 inches and a maximum line speed of 2450 feet per minute, and enclosed by permanent total enclosure (PTE).
- (b) Three (3) rotogravure proof presses, using the carbon adsorption solvent recovery system described above as control described as follows:
- (1) WCM-440, with a maximum printing width of 73 inches and a maximum line speed of 400 feet per minute
  - (2) WCM-450, installed in September of 1994, with a maximum printing width of 125 inches and a maximum line speed of 900 feet per minute,
  - (3) WCM-460, installed in December of 1993, with a maximum printing width of 78 7/8 inches and a maximum line speed of 600 feet per minute,
- (c) One (1) gravure cylinder wash machine, identified as GCW, installed in April of 1995, located in the east plant,
- (d) One (1) gravure parts press parts washer, identified as GPW, installed in 1991, located in the east plant
- (e) One (1) gravure cylinder wash machine, identified as WCWM, installed in May of 2000, located in the west plant, using the carbon adsorption solvent recovery system and enclosed by permanent total enclosure (PTE)
- (f) One (1) gravure press parts washer, identified as WGPW, installed in May of 2000, located in the west plant, enclosed by permanent total enclosure (PTE)

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations), the publication rotogravure presses shall be controlled by a carbon adsorption solvent recovery system that reduces the volatile organic emissions from the capture system by at least ninety percent (90%) by weight. The capture system shall attain an efficiency sufficient to achieve, at minimum, an overall control efficiency, in conjunction with the emission control system, of seventy-five percent (75%). The specific units are limited as follows:

- (a) rotogravure presses WRO-488 and WRO-489:
  - (a) a ducted capture system to the solvent recovery system with total control efficiency of no less than 75% on a monthly basis.
- (b) for rotogravure presses WRO-491, WRO-492, WRO-493, and WRO-494;
  - (1) daily adsorber efficiency of no less than 95%,
  - (2) rolling 12 month average of no less than 98% adsorber efficiency, and
  - (3) PTE (100% capture).

#### D.2.2 VOC Limits [326 IAC 2-2] [40 CFR 52.21]

This source is a major PSD source and the following presses have VOC limits such that PSD rules, 326 IAC 2-2 and 40 CFR 52.21, shall not apply:

- (a) for rotogravure press WR-429;
  - (1) rolling 12 month average of 34550 ton per year VOC input (691 ton/yr VOC emissions).
- (b) for rotogravure press WRO-490;
  - (1) rolling 12 month average of 4,910 tons per year of VOC input ( average VOC potential to emit of 53.2 tons per 12 consecutive months with compliance determined at the end of each month), and
  - (2) monthly solvent recovery overall efficiency of no less than 87%.
- (c) for rotogravure presses WR-441, WR-442, and WR-443;
  - (1) rolling 12 month average of no greater than 789 ton per month VOC input, and
  - (2) rolling 12 month average of no less than 98% absorber efficiency, and
  - (3) PTE (100% capture).
- (d) for rotogravure press WR-444 and proof press WCM-460;
  - (1) rolling 12 month average of 260 ton per month VOC input.
- (e) for the parts and cylinder washers, WGPW and WCWM:
  - (1) monthly rolling average of 500 tons of VOC input per 12 consecutive months. When operating the carbon adsorption system to achieve this limit, the carbon adsorption system shall maintain an overall control efficiency of 98% per 12 month period, rolled on a monthly basis.
  - (2) In the event that the carbon adsorption system is not operating, the amount of VOC input to the parts and cylinder washers shall be limited such that the VOC input with the carbon adsorption system operating times 0.02 added to the VOC input with the carbon adsorption system not operating shall not exceed VOC emissions of ten (10) tons per twelve (12) consecutive month period, rolled on a monthly basis.

#### D.2.3 PSD BACT Limitations [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 and 40 CFR 52.21(PSD BACT Limitations), the specific facilities have the following limitations:

- (a) for proof press WCM-450;
  - (1) no greater than 8.5 tons per month volatile organic solvents input limit, and

- (2) PTE (100% capture).

**D.2.4 VOC Control Requirement [326 IAC 2-2] [40 CFR 52.21]**

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Rotogravure presses, WRO-486, WRO-487, WRO-488, WRO-489 were constructed prior to the applicability date June 19, 1978, of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements. Pursuant to the Construction Permit for Press WR-429, some of the emissions reductions obtained by adding control to these presses were used to net out of later PSD requirements. Therefore, for rotogravure presses WRO-486 and WRO-487 shall have a ducted capture system to the solvent recovery system with total control efficiency of no less than 75% on a monthly basis.

**D.2.5 NSPS Requirements [326 IAC 12] [40 CFR 60, Subpart QQ]**

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- (a) Publication Rotogravure Printing [326 IAC 12] [40 CFR 60, Subpart QQ]
- (1) Pursuant to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430 through 60.435, Subpart QQ) emissions of volatile organic compounds (VOC) from rotogravure presses WR-429, WR-441, WR-442, WR-443, WR-444, WRO-490, WRO-491, WRO-492, WRO-493, and WRO-494 shall not be greater than or equal to 16 percent of the total mass of VOC solvent and water used during any one performance averaging period.
- (2) Rotogravure presses WRO-486, WRO-487, WRO-488, and WRO-489 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430 through 60.435, Subpart QQ), because they were constructed before the applicability date of the rule (October 28, 1980).
- (3) Proof presses WCM-440, WCM-450, and WCM-460 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430 through 60.435, Subpart QQ), because proof presses are specifically exempted from that rule.

**D.2.6 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]**

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- (a) The provisions of 40 CFR 60, Subpart A, apply to the rotogravure presses WR-429, WR-441, WR-442, WR-443, WR-444, WRO-490, WRO-491, WRO-492, WRO-493, and WRO-494, except when otherwise specified in 40 CFR 60.430 through 60.435, Subpart QQ.
- (b) The provisions of 40 CFR 60, Subpart A, do not apply to rotogravure presses WRO-486, WRO-487, WRO-488, and WRO-489 or proof presses WCM-440, WCM-450, and WCM-460 because the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430 through 60.435, Subpart QQ) does not apply.

**D.2.7 Printing and Publishing NESHAP [326 IAC 14][40 CFR Part 63, Subpart KK]**

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The publication rotogravure presses, proof presses, cylinder and parts cleaners, ink and solvent mixing and storage equipment, and solvent recovery system are subject to 40 CFR Part 63, Subpart KK.

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The Permittee shall limit the emissions of organic HAPs to no more than eight percent (8%) of the total volatile matter used each month. The emission limitation may be achieved by overall control of at least ninety-two percent (92%) of organic HAPs used, by substitution of non-HAP materials for organic HAPs, or by a combination of capture and control technologies and substitution of materials.

**D.2.8 General Provisions Relating to NESHAP [326 IAC 14][40 CFR Part 63, Subpart KK]**

The provisions of 40 CFR Part 63, Subpart A, apply to the publication rotogravure presses, proof presses, cylinder and parts cleaners, ink and solvent mixing and storage equipment, and solvent

recovery system, except when otherwise specified in 40 CFR 63.820 through 63.831, Subpart KK.

#### **D.2.9 Cold Cleaner Requirements [326 IAC 8-3-2]**

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Pursuant to 326 IAC 8-3-2, the owner or operator of the gravure cylinder wash machines, GCW, and WCWM, and the gravure press parts washers, GPW and WGPW, shall:

- (a) equip each cleaner with a cover,
- (b) equip each cleaner with a facility for draining cleaned parts,
- (c) close the degreaser cover whenever parts are not being handled in the cleaner,
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases,
- (e) provide a permanent, conspicuous label summarizing the operating requirements, and
- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can not evaporate into the atmosphere.

#### **D.2.10 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the carbon adsorption solvent recovery system.

### **Compliance Determination Requirements**

#### **D.2.11 Monitoring to Demonstrate Continuous Compliance [326 IAC 14][40 CFR Part 63, Subpart KK]**

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- (a) Continuous compliance of the carbon adsorption control system shall be demonstrated by:
  - (1) Performing a liquid-liquid material balance of the affected facility for each month as detailed in §63.824(b)(1)(i); or
  - (2) Using continuous emission monitors, conducting an initial performance test of capture efficiency, and continuously monitoring a site specific operating parameter to assure the capture efficiency as specified in §63.824(b)(1)(ii).
- (b) A performance test demonstrating initial compliance for the solvent recovery system is not required if the Permittee chooses to comply by means of the monthly liquid-liquid material balance. Otherwise, initial performance testing shall be conducted in accordance with the methods specified in §63.827.
- (c) At all time that the carbon adsorption control system for the parts and cylinder washers is in operation and being utilized to demonstrate compliance with the VOC emission limitations, the control system shall be monitored using the inlet and outlet analyzers on the solvent recovery system and monitoring the pressure differential in the enclosure to meet permanent total enclosure requirements.

#### **D.2.12 Compliance Determination [326 IAC 12] [40 CFR 60, Subpart QQ]**

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- (a) The solvent recovery system shall be in operation at all times that any of the rotogravure printing presses, WR-441, WR-442, WR-443, WR-444, WRO-491, WRO-492, WRO-493, and WRO-494, and proof presses, WCM-450, and WCM-460, singly or in combination, is in operation, or is being cleaned using organic solvents.

The source can comply with this condition by keeping the record of the malfunction reports of the solvent recovery system; and other malfunction reports of the presses, when the solvent recovery system is operating but the presses are not venting to the solvent recovery system.

- (b) The systems conveying the exhaust gases from the publication rotogravure production printing presses WR-429, WR-441, WR-442, and WR-443; WRO-491, WRO-492, WRO-493, and WRO-494 enclosures to the solvent recovery system shall operate at all times

any of the presses in the respective enclosures are in operation, or are being cleaned using organic solvents. These enclosures shall have natural draft opening areas totaling not in excess of 5% of the total area of the walls, floor, and the ceiling of the enclosure. The enclosures shall be equipped with adequate negative pressure ventilation to provide a minimum face air velocity of 200 feet per minute, when all natural draft openings are simultaneously open. A pressure drop of greater than or equal to 0.013 mmHg (0.007 in H<sub>2</sub>O) will demonstrate the 200 feet per minute face air velocity. All cylinder access doors (on the gear side) shall remain closed during the press operations except for the emergency escape. All personnel access doors (on the button side) shall remain closed, except for the momentary opening to allow access of personnel and materials. If these criteria are met, the VOC capture of the enclosure shall be considered to be 100%.

The source can comply with this condition by keeping the record of the malfunction reports of the systems conveying the exhaust gases from the enclosure; and other malfunction reports of the presses, when the systems conveying the exhaust gases from the enclosure to the absorber, are not operating but the presses in the respective enclosures are in operation.

- (c) The system conveying the exhaust gases from the proof presses, WCM-450 and WCM-460, to the solvent recovery system shall operate at all times the respective presses are in operation or are being cleaned using the organic solvents.

The source can comply with this condition by keeping the record of the malfunction reports of the systems conveying the exhaust gases from the enclosures; and other malfunction reports of the presses, when the systems conveying the exhaust gases from the enclosures to the adsorber, are not operating but the presses in the respective enclosures are in operation.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.2.13 Monitoring Requirements [326 IAC 14] [40 CFR 63.828]**

To demonstrate continuing compliance with the standards of §63.824, the Permittee shall monitor and inspect the carbon adsorption solvent recovery system and the ducted solvent capture system to ensure proper operation and maintenance by implementing one of the following:

- (a) Performing a liquid-liquid material balance for each month.
- (b) Use of continuous compliance emission monitors that comply with the performance specifications 8 or 9 of 40 CFR 60, appendices B and F. In conducting the quarterly audits required by appendix F, the Permittee must challenge the monitors with compounds representative of the gaseous emission stream being controlled.
- (c) If the Permittee chooses to comply with §63.824 through continuous emission monitoring of the carbon adsorption solvent recovery system and the ducted solvent capture system, he/she shall install, calibrate, operate, and maintain continuous emission monitors to measure the total organic volatile matter concentration at the inlets of the ducted solvent system and the outlets of the carbon adsorption solvent recovery system.
- (d) If the Permittee chooses to comply with §63.824 through the use of the carbon adsorption solvent recovery system and the ducted solvent capture system and demonstrating continuous compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, he/she shall:
  - (1) Submit to IDEM, OAQ at the address listed in Section C - General Reporting Requirements with the compliance status report required by §63.9(h), a plan that:
    - (A) Identifies the operating parameter to be monitored to ensure that the

capture efficiency measured during the initial compliance test is maintained;

- (B) Discusses why this parameter is appropriate for demonstrating ongoing compliance, and
  - (C) Identifies the specific monitoring procedures.
- (2) Set the operating parameter value, or range of values, that demonstrate compliance with the applicable emission standard of §63.824.
  - (3) Conduct monitoring in accordance with the plan submitted to IDEM, OAQ, unless comments received from IDEM, OAQ require an alternate monitoring scheme.
- (e) Any excursion from the required operating parameters which are monitored in accordance with Condition D.2.8(a) or (b), unless otherwise excused, shall be considered a violation of the applicable emission standard.

#### **D.2.14 Carbon Adsorption Unit Monitoring**

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- (a) An inspection shall be performed each calendar quarter of the carbon adsorption unit controlling the parts and cylinder washers. All defective beds shall be repaired or replaced. The Permittee is not required to shut down the system in order to conduct the quarterly inspection. The Permittee shall monitor and inspect the carbon adsorption solvent recovery system and the ducted solvent capture system to ensure proper operation and maintenance.
- (b) In the event that a failure of the carbon adsorber has been observed, the affected compartments will be shut down immediately until the failed units have been repaired or replaced.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.2.15 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.2.1, D.2.2, D.2.3, D.2.4, and D.2.6, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP/ VOC usage limits and/or the VOC emission limits established in Conditions D.2.1, D.2.2, D.2.3, D.2.4, and D.2.6.
  - (1) The VOC and HAP content of the inks and cleaning solvents used for each month;
  - (2) The cleanup solvent usage for each month;
  - (3) The total VOC and HAP usage for each month; and
  - (4) The weight of VOCs and HAPs emitted for each compliance period.
  - (5) The liquid-liquid material balances performed in accordance with §63.824.
  - (6) Other applicable record keeping requirements as specified in §63.829 to demonstrate compliance with 40 CFR 63.824, Conditions D.2.4 and D.2.6.
  - (7) The monthly average recovery efficiency for the carbon adsorption system.
  - (8) The malfunction reports of the systems as specified in Condition D.2.8.

- (b) To document compliance with Condition D.2.13, the Permittee shall maintain records of the results of the inspections required under D.2.13.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.16 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2, D.2.3, and D.2.4 and the compliance and performance testing reports required by 40 CFR §63.830 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### **Facility Description [326 IAC 2-7-5(15)]:**

Two (2) chromium plating lines, CRT-1 and CRT-2, installed in September of 1994, using a composite mesh pad system with a hepafilter as control, each having two (2) rectifiers with a maximum combined capacity of 10,000 amps.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]**

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart N.

#### **D.3.2 Chromium Electroplating and Anodizing NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]**

The provisions of 40 CFR 63, Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which are incorporated by reference as 326 IAC 20-8-1, apply to tanks, CRT-1 and CRT-2. A copy of this rule is attached.

#### **D.3.3 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)]**

- (a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.
- (b) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from tanks by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed one-hundredth milligrams of total chromium per dry standard cubic meter of ventilation air (0.015 mg/dscm) [equivalent to six and six-tenths times ten raised to the power of negative six grains of total chromium per dry standard cubic foot of ventilation air ( $6.6 \times 10^{-6}$  gr/dscf)].

#### **D.3.4 Work Practice Standards [326 IAC 14] [40 CFR 63.342(f)]**

The following work practice standards apply to CRT-1 and CRT-2:

- (a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain tanks CRT-1 and CRT-2, including the composite mesh pad system with the hepafilter as control and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.3.6.
- (b) Malfunctions and excess emissions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.3.6.
- (c) These operation and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section.
- (d) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAQ, which may include, but is not limited to, monitoring results; review of the OMP, procedures, and records; and inspection of the source.
- (e) Based on the results of a determination made under paragraph (d) of this condition, IDEM,

OAQ, may require that the Permittee make changes to the OMP required by Condition D.3.6. Revisions may be required if IDEM, OAQ finds that the plan:

- (1) Does not address a malfunction or period of excess emissions that has occurred;
- (2) Fails to provide for the operation of tanks CRT-1 and CRT-2, the composite mesh pad system with hepafilter and process monitoring equipment during a malfunction or period of excess emissions in a manner consistent with good air pollution control practices; or
- (3) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, monitoring equipment or other causes of excess emissions as quickly as practicable.

The work practice standards that address operation and maintenance must be followed during malfunctions and periods of excess emissions.

D.3.5 Operation and Maintenance Plan [326 IAC 14] [40 CFR 63.342(f)(3)]

- (a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of tanks CRT-1 and CRT-2. The OMP shall specify the operation and maintenance criteria for tanks, the composite mesh pad and hepafilter and monitoring equipment and shall include the following elements:
  - (1) For the composite mesh-pad system (CMP):
    - (A) Quarterly visual inspections of the device to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.
    - (B) Quarterly visual inspection of the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.
    - (C) Quarterly visual inspection of the duct work from the tank to the control device to ensure there are no leaks.
    - (D) Perform wash down of the composite mesh-pads in accordance with manufacturers recommendations.
- (b) The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans such as the PMP required in Condition D.3.5, as the OMP, provided the alternative plans meet the above listed criteria in Condition D.3.6(a).
- (c) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or period of excess emissions at the time the plan is initially developed, the Permittee shall revise the OMP within forty-five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining tanks, the air pollution control device, the add-on air pollution control device and the monitoring equipment, during similar malfunction or period of excess emissions events, and a program for corrective action for such events.
- (d) If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAQ.

- (e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAQ for the life of tanks or until the tank is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAQ for a period of five (5) years after each revision to the plan.
- (f) Compliance with the requirements of this OMP satisfies the requirements of the Preventive Maintenance Plan (PMP) required under 326 IAC 2-7-5 (13).

**Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]**

**D.3.6 Performance Testing [326 IAC 2-1.1-11][326 IAC 2-7-6(1)] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344]**

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- (a) A performance test demonstrating initial compliance for tanks CRT-1 and CRT-2 was performed on April 16-18, 1998. During the initial performance test, it was determined that the average pressure drop across the composite mesh pad system was 6.1 inches of water and the average outlet chromium concentration is 0.0012 mg/dscm.
- (b) The Permittee is not required to further test tanks CRT-1 and CRT-2 by this permit. However, the IDEM may require testing when necessary to determine if the tanks are in compliance. If testing is required by the IDEM, compliance with the limit specified in Condition D.3.3 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.
- (c) Any change, modification, or reconstruction of these tanks, the composite mesh pad system and hepafilters or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.3.7 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 63.343(c)]**

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Pursuant to 40 CFR 63.343(c)(1)(ii), when using a composite mesh-pad system to comply with the limit specified in Condition D.3.3, the Permittee shall monitor and record the pressure drop across the composite mesh-pad system during tank operation once each day that either chromium electroplating tank is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within  $\pm 1$  inch of water column of the pressure drop value established during the initial performance test, or within the range of compliant values for pressure drop established during multiple performance tests.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.3.8 Record Keeping Requirements [326 IAC 2-7-5(3)] [40 CFR 63.346]**

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The Permittee shall maintain records to document compliance with Conditions D.3.3, D.3.4 and D.3.6 using the forms provided with this permit. These records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit and include a minimum of the following:

- (a) Inspection records for the air pollution control techniques, the composite mesh pad system and hepafilter and monitoring equipment to document that the inspection and maintenance required by Conditions D.3.7 and D.3.9 have taken place. The record can take the form of a checklist and should identify the following:
  - (1) The device inspected;

- (2) The date of inspection;
  - (3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and
  - (4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.
- (b) Records of all maintenance performed on tanks CRT-1 and CRT-2, the composite mesh pad system and hepafilter and monitoring equipment.
  - (c) Records of the occurrence, duration, and cause (if known) of each malfunction of tanks CRT-1 and CRT-2, the composite mesh pad and hepafilter and monitoring equipment.
  - (d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of tanks CRT-1 and CRT-2, the composite mesh pad and hepafilter and monitoring equipment as indicated by monitoring data collected in accordance with this condition.
  - (e) Records of actions taken during periods of malfunction or excess emissions when such actions are inconsistent with the OMP.
  - (f) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.
  - (g) Test reports documenting results of all performance tests.
  - (h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.
  - (i) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.
  - (j) The total process operating time of each tank, during the reporting period.
  - (k) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.3.11.

D.3.9 Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 3-6-4(b)] [40 CFR 63.344(a), 63.345 and 63.347]

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The notifications and reports required in this section shall be submitted to IDEM, OAQ using the address specified in Section C - General Reporting Requirements. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (a) Notifications:
  - (1) Initial Notifications  
The Permittee shall notify IDEM, OAQ in writing that the source is subject to 40 CFR Part 63, Subpart N. The notification shall be submitted no later than one hundred eighty (180) days after the compliance date and shall contain the information listed in 40 CFR 63.347(c)(1).
  - (2) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63 Subpart N.

- (A) The NCS shall be submitted to IDEM, OAQ, and shall list, for each tank, the information identified in 40 CFR 63.347(e)(2).
  - (B) The NCS for tanks CRT-1 and CRT-2 was submitted to IDEM, OAQ.
- (3) Notification of Construction or Reconstruction  
Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to 40 CFR 63, Subpart N (including non-affected tanks defined in 40 CFR 63.344(e)) without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ. In addition, the Permittee may not change, modify, or reconstruct tanks CRT-1 and CRT-2 without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ.
  - (A) The NCR shall contain the information identified in 40 CFR 63.345(b) (2) and (3).
  - (B) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling both existing tanks and non-affected facilities by a common control technique or device.
  - (C) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct tanks CRT-1 and CRT-2 serves as this notification.
  - (D) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAQ before construction, modification, or reconstruction may commence.
- (b) Performance Test Results  
The Permittee shall document results from the initial performance test and any future performance tests in a complete test report that contains the information required in 40 CFR 344(a).  
  
The Permittee shall submit reports of performance test results as part of the Notification of Compliance Status, described in 40 CFR 63.347(e), no later than forty-five (45) days following the completion of the performance test.
- (c) Ongoing Compliance Status Report  
The Permittee shall prepare summary reports to document the ongoing compliance status of tanks CRT-1 and CRT-2 using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).  
  
Because tanks CRT-1 and CRT-2 are located at a site that is a major source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be completed and submitted according to the following schedule.
  - (1) This report shall be submitted semiannually on a calendar year basis, unless otherwise directed by IDEM, OAQ. The report shall be submitted within thirty (30) days after the end of each reporting period (which ends June 30 and December 31 respectively).
  - (2) If the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c) show that the emission limit has been exceeded, quarterly reports shall be submitted.

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted quarterly until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

- (1) IDEM, OAQ may determine on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of this facility.
- (2) If either of the following conditions are met, semiannual reports shall be prepared and submitted to IDEM, OAQ:
  - (A) The total duration of excess emissions (as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)) is one percent (1%) or greater of the total operating time as defined in Condition D.3.8(b) for the reporting period; or
  - (B) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five percent (5%) or greater of the total operating time as defined in Condition D.3.8(b).

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted semiannually until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

- (3) IDEM, OAQ may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source.

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (i) One (1) pneumatic dust and paper trim collection system located in the east plant and consisting of:
  - (1) One (1) cyclone, identified as EPC-3, installed in May of 1994, exhausting to one (1) baghouse, identified as EPBH-C, installed in June of 1994,
  - (2) One (1) cyclone, identified as EPC-1, installed in 1978,
  - (3) One (1) cyclone, identified as EPC-2, installed in 1978,
  - (4) One (1) cyclone concentrator, identified as EPCON-5, installed in June of 1995, with concentrated paper sent to cyclone, EPC-1, EPC-2, and EPC-3, exhausting to one (1) baghouse, EPBH-E, installed in June of 1995,
  - (5) Three (3) baghouses, identified as EPBH-C, EPBH-D, installed in June of 1994, and EPBH-E, with collected dust sent to one (1) dust auger, silo, and baghouse (EPBH-F) system (identified as an insignificant activity),
  - (6) One (1) cyclone concentrator, identified as EPCON-6, with concentrated dust sent to one (1) cyclone, EPC-4, installed in May of 1994, or to one (1) cyclone concentrator, EPCON-5, with air exhausting to one (1) baghouse, EPBH-E,
  - (7) One (1) cyclone, identified as EPC-4, with concentrated dust sent to one (1) dust auger, silo, and baghouse (EPBH-F) system (identified as an insignificant activity with air exhausting to one (1) baghouse, EPBH-D,
- (j) One (1) pneumatic paper trim collection system located in the west plant and consisting of:
  - (1) One (1) cyclone, identified as WPC-1, installed in June of 1969,
  - (2) One (1) cyclone, identified as WPC-2, installed in June of 1969,
  - (3) One (1) cyclone concentrator, identified as WPCON-3, installed in August of 1993, modified in June 2002, with concentrated paper sent primarily to a cyclone, WPC-1 or secondarily to WPC-2, exhausting to one (1) baghouse, WPBH, installed in August of 1993,
  - (4) One (1) baghouse, identified as WPBH, with collected dust sent to cyclone, WPC-1 or WPC-2, with air exhausting to the bindery,
  - (5) One (1) cyclone concentrator, identified as WPCON-4, installed in August of 1993, modified June 2002, which has a maximum capacity of 10,500 pounds per hour, with concentrated paper sent primarily to cyclone WPC-1, or secondarily to WPC-2,
  - (6) One (1) cyclone concentrator, identified as WPCON-5, installed in June 2002, which has a maximum capacity of 10,500 pounds per hour, with concentrated paper sent primarily to cyclone WPC-1, or secondarily to WPC-2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.4.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the pneumatic paper dust and trim collection in the east plant system shall not exceed allowable PM emission rate of 20.3 pounds per hour based on a process weight rate of 10.19 tons of paper per hour using the following equation:  
Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:  
$$E = 4.10 P^{0.67}$$
where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the three (3) waste paper concentrators in the west plant system, WPCON- 3, WPCON-4, and WPCON-5, and the two (2) cyclones, WPC-1 and WPC-2, shall not exceed allowable PM emission rate of 26.00 pounds per hour based on a process weight rate of 31,500 pounds of paper per hour using the following equation:  
Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:  
$$E = 4.10 P^{0.67}$$
where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.4.2 PSD Limit [326 IAC 2-2][40 CFR 52.21]

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- (a) PM and PM-10 emissions from the three (3) waste paper concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 and the two (2) cyclones WPC-1 and WPC-2, shall be limited to 1.0 lb/ton and 0.6 lb/ton, respectively. Compliance with these limits shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable and also satisfy the requirement of Condition D.1.1.
- (b) Any change or modification to the three (3) waste paper concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 and the two (2) cyclones WPC-1 and WPC-2, that may increase potential emissions to greater than twenty-five (25) tons per year of PM, or fifteen (15) tons per year of PM-10, must have prior approval from the Office of Air Quality.
- (c) The input of paper to the three (3) waste paper concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 and the two (2) cyclones WPC-1 and WPC-2, shall be limited to less than 25,000 tons per twelve (12) consecutive month period, rolled on a monthly basis. This usage limit is required to limit the potential to emit of PM to less than 25 tons per 12 consecutive month period and PM10 to less than 15 tons per 12 consecutive month period. Compliance with this limit shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

#### D.4.3 Preventive Maintenance Plan

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.4.4 Visible Emissions Notations

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- (a) Weekly visible emission notations of the pneumatic paper dust and trim collection systems stack exhausts, from WPC-1, WPC-2, WPCON-4, EPC-1, EPC-3 & EPBH-C, shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee or other trained observer shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### **D.4.5 Cyclone Inspections**

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An inspection shall be performed each calendar quarter of the two (2) cyclones (WPC-1 and WPC-2) and the three (3) waste paper concentrators (WPCON-3, WPCON-4, WPCON-5) when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

#### **D.4.6 Broken Bag or Failure Detection**

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In the event that bag failure has been observed:

- (a) Within eight (8) hours of the determination of failure, response steps including a timetable for completion shall be devised.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.4.7 Record Keeping Requirements**

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- (a) To document compliance with D.4.2(c), the Permittee shall maintain monthly records of paper throughput to the three (3) waste paper concentrators (WPCON-3, WPCON-4, and WPCON-5), and the two (2) cyclones (WPC-1 and WPC-2).
- (b) To document compliance with Condition D.4.4, the Permittee shall maintain records of daily visible emission notations of the waste paper collection system stack exhaust.
- (c) To document compliance with Condition D.4.5, the Permittee shall maintain records of the results of the inspections required under Condition D.4.5 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.4.8 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.4.2(c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the report forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581  
Mailing Address: Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581  
Mailing Address: Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- ☐ The Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - ☐ The Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581  
Mailing Address: Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Report period

Beginning: \_\_\_\_\_

Ending: \_\_\_\_\_

Boiler Affected

Alternate Fuel

Days burning alternate fuel  
From To


*(can omit identification of boiler affected if only one gas boiler at this plant)*

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
PART 70 OPERATING PERMIT  
CHROMIUM ELECTROPLATING AND ANODIZING NESHAP  
ONGOING COMPLIANCE STATUS REPORT**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581  
Mailing Address: Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009  
Tank ID #: CRT-1 and CRT-2  
Type of process: Hard  
Monitoring Parameter: Pressure drop  
Parameter Value: 6.1  $\pm$ 1 inch of water  
Limits: Total chromium concentration may not exceed 0.01mg/dscm

This form is to be used to report compliance for the Chromium Electroplating and Anodizing NESHAP only.  
The frequency for completing this report may be altered by IDEM, OAQ, Compliance Branch.

**Companies classified as a major source:** *Submit this report no later than 30 days after the end of the reporting period.*

**Companies classified as an area source:** *Complete this report no later than 30 days after the end of the reporting period, and retain on site unless otherwise notified.*

This form consists of 2 pages

Page 1 of 2

BEGINNING AND ENDING DATES OF THE REPORTING PERIOD:

TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD:

**MAJOR AND AREA SOURCES: CHECK ONE**

**9** NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.

**9** THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING).

**AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY:**

IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.

JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

**HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY:**

LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.

JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV

MAR	JUN	SEP	DEC
-----	-----	-----	-----

## CHROMIUM ELECTROPLATING AND ANODIZING NESHAP ONGOING COMPLIANCE STATUS REPORT

ATTACH A SEPARATE PAGE IF NEEDED

Page 2 of 2

IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT:

DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:

ADDITIONAL COMMENTS:

### ALL SOURCES: CHECK ONE

- 9 I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.
- 9 THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED.

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581  
Mailing Address: Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009  
Facility: Press WRO-490  
Parameter: Volatile Organic Compound (VOC) input  
Limit: 4910 tons per month (409.2 tons per month) rolled on a 12 month basis

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581  
Mailing Address: Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009  
Facility: Rotogravure Press WR-429  
Parameter: Volatile Organic Compound Input  
Limit: 34,550 ton per year rolled on a 12 month basis

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581  
Mailing Address: Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009  
Facility: Proof Press WCM-450  
Parameter: Volatile Organic Compounds Input  
Limit: 8.5 tons per month rolled on a 12 month basis

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581  
Mailing Address: Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009  
Facility: Presses WR-441, WR-442, and WR-443  
Parameter: Volatile Organic Compounds Input  
Limit: 789 tons per month rolled on a 12 month basis

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581  
Mailing Address: Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009  
Facility: Press WR-444 and Proof Press WCM-460  
Parameter: Volatile Organic Compounds Input  
Limit: 260 tons per month rolled on a 12 month basis

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581  
Mailing Address: Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009  
Facility: Boilers B1 and B2  
Parameter: SO<sub>2</sub>  
Limit: 245 tons average per 12 month consecutive period

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581  
Mailing Address: Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009  
Facility: Boiler B4  
Parameter: No. 2 Distillate Fuel Oil Input  
Limit: 516,000 gallons per month, rolled on a 12 month basis, at a sulfur content of 0.05%

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581  
Mailing Address: Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009  
Facility: Boiler B4  
Parameter: Natural Gas Input  
Limit: 72 million cubic feet per month rolled on a 12 month basis

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581  
Mailing Address: Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009  
Facility: Parts and Cylinder Washers, WGPW and WCWM  
Parameter: Volatile Organic Compound Input  
Limit: 500 ton per year rolled on a 12 month basis

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

### PART 70 SOURCE MODIFICATION QUARTERLY REPORT

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: Old Route 30 West, Warsaw, IN 46586  
Mailing Address: P.O. Box 837, Warsaw, IN 46586  
Source Modification No.: 085-15579-00009  
Facility: Three (3) waste paper concentrators (WPCON-3, WPCON-4, WPCON-5) and the two (2) cyclones (WPC-1 and WPC-2).  
Parameter: PM and PM10  
Limit: The input of paper to each of these processes, shall be limited to less than 25,000 tons per twelve (12) consecutive month period, rolled on a monthly basis.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	Paper Input This Month	Paper Input Previous 11 Months	Paper Input 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Address: 2801 West Old Route 30, Warsaw, Indiana 46581  
Mailing Address: Old Route 30 West, P.O. Box 837, Warsaw, Indiana 46581-0837  
Part 70 Permit No.: T 085-6040-00009

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

August 5, 2002  
**Indiana Department of Environmental Management  
Office of Air Quality**

Addendum to the  
Technical Support Document for a Part 70 Operating Permit

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Location: 2801 West Old Route 30, Warsaw Indiana 46581-0837  
County: Kosciusko  
SIC Code: 2754  
Operation Permit No.: T085-6040-00009  
Permit Reviewer: Holly M. Stockrahm

On March 29, 2001, the Office of Air Quality (OAQ) had a notice published in the Times Tribune, Warsaw, Indiana, stating that R.R. Donnelley & Sons Company - Warsaw Manufacturing Division had applied for a Part 70 Operating Permit to operate publication rotogravure printing. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On April 29, 2001, the source, R.R. Donnelley & Sons Company - Warsaw Manufacturing Division, submitted the following comments. Comments made on the Technical Support Document (TSD) will not result in a change to the TSD. The OAQ prefers that the TSD reflect the permit that was on public notice. Change to the permit or technical support material that occur after public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these concerns are documented and part of the record regarding the permit decision. Changes to the permit are denoted by bolding **added language** and striking out ~~deleted language~~.

**Comment 1:**

Throughout the permit, typographical errors, cross-references to other permit conditions, and numbering sequence errors should be corrected as noted.

**Response to Comment 1:**

IDEM agrees to correct all typographical errors, cross-references to other permit conditions, and document format errors as noted.

**Comment 2:**

Corrections are required to the Table of Contents and associated regulatory citations to correspond to the headings in the document.

**Response to Comment 2:**

IDEM agrees. The Table of Contents has been changed as follows:

**TABLE OF CONTENTS**

**A SOURCE SUMMARY**

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] **[326 IAC 2-7-1(22)]**
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] **[326 IAC 2-7-5(15)]**
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] **[326 IAC 2-7-5(15)]**
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

**B GENERAL CONDITIONS**

- ~~B.1 Permit No Defense [IC 13]~~
- ~~B.2 Definitions [326 IAC 2-7-1]~~
- B.32 Permit Term [326 IAC 2-7-5(2)]
- B.34 Enforceability [326 IAC 2-7-7(a)]
- B.45 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.56 Severability [326 IAC 2-7-5(5)]
- B.67 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.78 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] **[326 IAC 2-7-6(6)]**
- B.89 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.109 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] **[326 IAC 2-7-5(3)(C)]**
- B.1011 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.1211 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)]  
[326 IAC 2-7-6(1) and (6)] **[326 IAC 1-6-3]**
- B.1213 Emergency Provisions [326 IAC 2-7-16]
- B.1314 Permit Shield [326 IAC 2-7-15] **[326 IAC 2-7-20] [326 IAC 2-7-12]**
- B.1415 ~~Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~ **Prior Permits Superseded [326 IAC 2-1.1-9.5]**
- B.1516 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.1617 Permit Modification, Reopening, Revocation and Reissuance, or Termination **[326 IAC 2-7-5-(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**
- B.1718 Permit Renewal [326 IAC 2-7-4]
- B.1819 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.1920 Permit Revision Under Economic Incentives and Other Programs **[326 IAC 2-7-12(b)(2)]**

- B.2024 Operational Flexibility [326 IAC 2-7-20] **[326 IAC 2-7-10.5]**
- B.2122 **Source Modification** Construction Permit Requirement [326 IAC 2-7-10.5]
- B.2223 Inspection and Entry [326 IAC 2-7-6(2)] **[IC 13-14-2-2]**
- B.2324 Transfer of Ownership or Operation [326 IAC 2-7-11]
- B.2425 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

## C SOURCE OPERATION CONDITIONS

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates **Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Stack Height [326 IAC 1-7]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140,

### Subpart M]

### Testing Requirements [326 IAC 2-7-6(1)]

- C.9 Performance Testing [326 IAC 3-6]

### Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.10 Compliance Requirements [326 IAC 2-1.1-11]
- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Maintenance of **Emission** Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.13 Monitoring Methods [326 IAC 3] **[40 CFR 60] [40 CFR 63]**
- C.14 Pressure Gauge and **Other Instrument** Specifications **[326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

### Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] **[326 IAC 2-7-6]**
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] **[326 IAC 2-7-6]**

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)]  
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- C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] **[326 IAC 2-7-6]**
- C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] **[326 IAC 2-1.1-11]**

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- C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

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### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2]
- D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1]
- D.1.3 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1]
- D.1.4 NSPS for Small Industrial-Commercial-Institutional Steam Generating Units  
[~~326 IAC 12~~][40 CFR 60, Subpart Dc] **[326 IAC 12]**
- D.1.5 Sulfur Dioxide (SO<sub>2</sub>) and Oxides of Nitrogen (NO<sub>x</sub>) PSD Emission  
Limitations  
[326 IAC 2-2][40 CFR 52.21]
- D.1.6 Preventive Maintenance Plan

### **Compliance Determination Requirements**

- D.1.7 Testing Requirements [326 IAC 2-7-6(1), (6)][326 IAC 2-1.1-11]
- D.1.8 Sulfur Dioxide Emissions and Sulfur Content

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.1.9 Visible Emissions Notations

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- D.1.10 Record Keeping Requirements
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- D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8-5-5]
- D.2.2 PSD Synthetic Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.2.3 PSD BACT Limitations [326 IAC 2-2] [40 CFR 52.21]
- D.2.4 VOC Control Requirement [326 IAC 2-2] [40 CFR 52.21]
- D.2.5 NSPS Requirements [326 IAC 12] [40 CFR 60, Subpart QQ]
- D.2.6 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]
- D.2.67 Printing and Publishing NESHAP [326 IAC 14] [40 CFR Part 63, Subpart  
KK]

- D.2.8 General Provisions Relating to NESHAP [326 IAC 14][40 CFR Part 63, Subpart A]
- D.2.79 Cold Cleaner Requirements [326 IAC 8-3-2]
- D.2.810 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

#### **Compliance Determination Requirements**

- D.2.911 Monitoring to Demonstrate Continuous Compliance [326 IAC 14] [40 CFR Part 63.824 (b)(1), Subpart KK]
- D.2.102 Compliance Determination [326 IAC 12] [40 CFR 60, Subpart QQ]
- ~~D.2.11 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]~~

#### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.2.123 Monitoring Requirements [326 IAC 14][40 CFR 63.828]
- D.2.134 Carbon Adsorption Unit Monitoring

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- D.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]
- D.3.2 Chromium Electroplating and Anodizing NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]
- D.3.3 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)]
- D.3.4 Work Practice Standards [326 IAC 14][40 CFR 63.342(f)]
- D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
- D.3.6 Operation and Maintenance Plan [326 IAC 14] [40 CFR 63.342(f)(3)]

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- D.3.7 Performance Testing [326 IAC 2-1.1-11][326 IAC 2-7-6(1)] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344]

#### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.3.8 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 63.343(c)]

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.3.9 Record Keeping Requirements [326 IAC 2-7-5(3)] [40 CFR 63.346]
- D.3.10 Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 3-6-4(b)][40 CFR

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**D.4 FACILITY OPERATION CONDITIONS - Pneumatic ~~PM~~ Dust and Paper**  
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D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]~~[326 IAC 2-1.1-11]~~

D.4.4 ~~Particulate Matter (PM)~~

~~———— D.4.5 Source Limitation [326 IAC 6-3]~~

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.4.~~56~~ Visible Emissions Notations

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D.4.~~87~~ Broken Bag or Failure Detection

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D.4.~~98~~ Record Keeping Requirements

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**Comment 3:**

In Section A.2, the stack identifications contained in this section should be deleted because they do not reflect physical emission points. The stack designations represent classes of exhaust points; not the actual stacks themselves. The pollution control systems associated with the various emission units are

clearly identified in the TSD, eliminating the need for the stack identifications to be included in this section. Additionally, we also request that the installation dates for the equipment also be deleted.

### Response to Comment 3:

The descriptions contained under A.2 is not enforceable, but intended to be descriptive and may serve to avoid confusion when making future modifications. IDEM will leave in the installation dates, and remove the stack information that does not reflect physical emission points. Section A.2 and the respective D descriptions have been changed as follows:

- (a) Four (4) natural gas or No. 2 or No. 6 oil fired boilers ~~with emissions exhausting to stack 1/1,~~ described as follows:
  - (1) B1 and B2, installed in July of 1971 and October 1979, respectively, each with a maximum rated capacity of 85 MMBtu/hr,
  - (2) B3, installed in October of 1979, with a maximum rated capacity of 78 MMBtu/hr,
  - (3) B4, installed in June of 1994, with a maximum rated capacity of 98.4 MMBtu/hr.
- (b) Fourteen (14) publication rotogravure printing presses, each using a carbon adsorption solvent recovery system with seventeen (17) adsorbers as control, ~~exhausting to stack 2/2,~~ described as follows:
  - (1) WR-429, installed in September of 1985, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute, and enclosed by permanent total enclosure (PTE),
  - (2) WRO-486, installed in December of 1970, with a maximum printing width of 69 inches and a maximum line speed of 1600 feet per minute,
  - (3) WRO-487, installed in December of 1971, with a maximum printing width of 69 inches and a maximum line speed of 2000 feet per minute,
  - (4) WRO-488 and WRO-489, installed in March of 1979 and September of 1978, respectively, with each press having a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute,
  - (5) WRO-490, installed in July of 1990, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2756 feet per minute,
  - (6) ~~WRO-491; and WRO-492, and WRO-493 and WRO-494, installed in August of 1994, February of 1995, November of 1995, and November of 1995, respectively, not yet installed,~~ with each press having a maximum printing width of 125 inches and a maximum line speed of 3000 feet per minute, and enclosed by permanent total enclosure (PTE). WRO-493 and WRO-494 are pre-approved presses at the time of this permit issuance **under Construction Permit PSD/CP085-4396-00009.**
  - (7) WR-444, installed in December of 1996, with a maximum printing width of 78 3/4 inches and a maximum line speed of 2450 feet per minute, and, although not required by rule, enclosed by permanent total enclosure (PTE),

- (8) WR-441, WR-442, WR-443, installed in December of 1996, with each press having a maximum printing width of 78 3/4 inches and a maximum line speed of 2450 feet per minute, and enclosed by permanent total enclosure (PTE);.
- (c) ~~Two (2)~~ **Three (3)** rotogravure proof presses, using the carbon adsorption solvent recovery system described above as control, ~~exhausting to stack 2/2,~~ described as follows:
  - (1) **WCM-440, with a maximum printing width of 73 inches and a maximum line speed of 400 feet per minute**
  - (2) WCM-450, installed in September of 1994, with a maximum printing width of 125 inches and a maximum line speed of 900 feet per minute,
  - ~~(2)~~(3) WCM-460, installed in December of 1993, with a maximum printing width of 78 7/8 inches and a maximum line speed of 600 feet per minute,
- (d) One (1) gravure cylinder wash machine, identified as GCW, installed in April of 1995, ~~located in the east plant and exhausting to stack 3/4.~~
- (e) One (1) gravure parts press parts washer, identified as GPW, installed in 1991, located in the east plant, ~~and exhausting to stack 3/4.~~
- (f) One (1) gravure cylinder wash machine, identified as WCWM, installed in May of 2000, ~~located in the east-west plant, using the carbon adsorption solvent recovery system and enclosed by permanent total enclosure (PTE) and exhausting to stack 2/2.~~
- (g) One (1) gravure press parts washer, identified as WGPW, installed in May of 2000, located in the ~~east-west~~ plant, enclosed by permanent total enclosure (PTE) ~~and exhausting to stack 2/2.~~
- (h) Two (2) chromium plating lines, CRT-1 and CRT-2, installed in September of 1994, using a composite mesh pad system with a hepafilter as control, each having two (2) rectifiers with a maximum combined capacity of 10,000 amps, ~~exhausting to stack 5.~~
- ~~(j)~~(i) One (1) pneumatic dust and paper trim collection system located in the east plant and consisting of:
  - (1) One (1) cyclone, identified as EPC-3, **installed in May of 1994, exhausting to one (1) baghouse, identified as EPBH-C, installed in June of 1994, which exhausts to stack 3/4,**
  - (2) One (1) cyclone, identified as EPC-1, installed in 1978, ~~exhausting to stack 3/4,~~
  - (3) One (1) cyclone, identified as EPC-2, installed in 1978, ~~exhausting to stack 3/4,~~
  - (4) One (1) **cyclone** concentrator, identified as EPCON-5, installed in June of

- 1995, with concentrated paper sent to cyclone, EPC-1, **EPC-2, or EPC-3** and exhausting to one (1) baghouse, EPBH-E, installed in June of 1995, ~~which exhausts stack 3/4.~~
- (5) Three (3) baghouses, identified as EPBH-C, EPBH-D, installed in June of 1994, ~~and EPBH-E~~, with collected dust sent to one (1) dust **auger, silo, and baghouse (EPBH-F) system (identified as an insignificant activity)**, ~~concentrator, identified as EPCON-6, installed in June of 1995, exhausting to stack 3/4.~~
- (6) One (1) **cyclone** concentrator, identified as EPCON-6, with concentrated ~~paper dust~~ sent to one (1) cyclone, EPC-4, installed in May of 1994, or to one (1) **cyclone** concentrator, EPCON-5, with air exhausting to one (1) baghouse, EPBH-E, ~~which exhausts to stack 3/4.~~
- (7) One (1) cyclone, identified as EPC-4, with **concentrated dust sent to one (1) dust auger, silo, and baghouse (EPBH-F) system (identified as an insignificant activity)** with air exhausting to one (1) baghouse, EPBH-D, ~~which exhausts to stack 3/4.~~
- (j) One (1) pneumatic paper trim collection system located in the west plant and consisting of:
- (1) One (1) cyclone, identified as WPC-1, installed in June of 1969, ~~exhausting to stack 3/4~~
- (2) One (1) cyclone, identified as WPC-2, installed in June of 1969, ~~exhausting to stack 3/4.~~
- (3) One (1) **cyclone** concentrator, identified as WPCON-3, installed in August of 1993, with concentrated paper sent to a cyclone, WPC-1 or WPC-2, exhausting to one (1) baghouse, WPBH, installed in August of 1993, ~~which exhausts to stack 3/4.~~
- (4) One (1) baghouse, identified as WPBH, with collected dust sent to cyclone, WPC-1 or WPC-2, with air exhausting to the bindery.
- (5) One (1) **cyclone** concentrator, identified as WPCON-4, installed in August of 1993, with concentrated paper sent to cyclone, WPC-1 or WPC-2, ~~either exhausting to stack 3/4.~~
- (k) Six (6) cylinder making finishing sinks located in the ~~west~~ **east** plant, identified as EPFS-1 through EPFS-6, installed in September of 1994, ~~exhausting to stack 2/3.~~
- (j)(l) One (1) wastewater treatment system located in the east plant and consisting of:
- (1) One (1) 3000 gallon solvent/water separator, identified as WWT-1, installed in 1996, ~~exhausting to stack 3/4.~~
- (2) One (1) 1000 gallon solvent/water separator, identified as WWT-2, installed in 1985, ~~exhausting to stack 3/4.~~
- (3) One (1) 17,800 gallon air sparging tank, identified as WWT-3, installed in

1985, ~~exhausting to stack 3/4.~~

~~(m)~~ One (1) cylinder making cleaning station located in the east plant, identified as EPCS, installed in September of 1994, ~~exhausting to stack 2/3.~~

~~(m)~~(m) One (1) cylinder making finishing sink station located in the west plant, identified as WPFS-1, installed in April of 1990, ~~exhausting to stack 2/3.~~

~~(n)~~(n) Thirty-seven (37) storage tanks, installed in dates ranging from 1960 through 1989, (specific dates are discussed in the Technical Support Document), ~~exhausting to stack 2/2.~~

**Comment 4:**

The descriptions of boilers B1-B3 should be revised to correctly identify the Btu ratings and installation dates of these boilers.

**Response to Comment 4:**

RR Donnelley did not submit revised Btu ratings, and the Btu ratings match those submitted in the permit application. The date of installation shall remain as discussed in Response to Comment 3. There is no change to the permit as a result of this comment.

**Comment 5:**

A revision is needed to clearly identify the construction permit under which presses WRO-493 and WRO-494 were approved.

**Response to Comment 5:**

IDEM agrees. Section A.2(b)(6) has been changed as follows:

WRO-491; **and** WRO-492, **and** WRO-493 **and** WRO-494, installed in August of 1994, February of 1995, November of 1995, and November of 1995, respectively, **not yet installed**, with each press having a maximum printing width of 125 inches and a maximum line speed of 3000 feet per minute, and enclosed by permanent total enclosure (PTE). WRO-493 and WRO-494 are pre-approved presses at the time of this permit issuance **under Construction Permit PSD/CP085-4396-00009.**

**Comment 6:**

Paragraph A.2(c) must be modified to reflect the correct number of proof presses and their descriptions.

**Response to Comment 6:**

IDEM agrees. A.2(c) has been changed as follows:

- (c) ~~Two (2)~~ **Three (3)** rotogravure proof presses, using the carbon adsorption solvent recovery system described above as control, exhausting to stack 2/2, described as follows:
- (1) **WCM-440, with a maximum printing width of 73 inches and a maximum line speed of 400 feet per minute**
  - (2) WCM-450, installed in September of 1994, with a maximum printing width of 125 inches and a maximum line speed of 900 feet per minute,**
  - ~~(2)~~**(3) WCM-460, installed in December of 1993, with a maximum printing width of 78 **7/8** inches and a maximum line speed of 600 feet per minute,**

**Comment 7:**

The location of emission unit WCWM must be corrected under A.2(f).

**Response to Comment 7:**

IDEM agrees. See Response to Comment 3.

**Comment 8:**

The location of emission unit WGPW must be corrected under A.2(g).

**Response to Comment 8:**

IDEM agrees. See Response to Comment 3.

**Comment 9:**

Under A.2(i) the description of the East Plant Byproducts System should be updated.

**Response to Comment 9:**

IDEM agrees. See Response to Comment 3.

**Comment 10:**

A.2(j) should be updated.

**Response to Comment 10:**

IDEM agrees. See Response to Comment 3.

**Comment 11:**

The location of emission units EPFS-1 through EPFS-6 should be corrected under A.2.(k).

**Response to Comment 11:**

IDEM agrees. See Response to Comment 3.

**Comment 12:**

A.2(m) EPCS is no longer in operation and has been removed.

**Response to Comment 12:**

IDEM agrees. See Response to Comment 3.

**Comment 13:**

We request the deletion of Condition C.10 Compliance Requirements [326 IAC 2-1.1-11] from this permit because it is unreasonable. We note that a review of other final TV permits issued by IDEM for other printing facilities do not contain this requirement. Finally, Section D of the TV draft already contains several periodic testing requirements for specific emission units that provide IDEM with the assurance that the facility will continue to operate in compliance with applicable requirements.

**Response to Comment 13:**

Condition C.10 based on authority given under 326 IAC 2-1.1-11 states that “The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.” Compliance monitoring conditions are in the permit in order to ensure continuous compliance with the requirements. Compliance monitoring conditions in Section D specify specific methods that IDEM believes at the time of issuance will ensure continuous compliance. However, Condition C.10 gives IDEM the right to require other means to assure compliance, even if not specified in the D section. There is no change to the permit as a result of this comment.

**Comment 14:**

The facility description under D.1 should be modified to be consistent with Condition A.2.

**Response to Comment 14:**

IDEM agrees. See the Response to Comment 3.

**Comment 15:**

A minor correction to Condition D.1.1(a) needs to be made to correctly identify the particulate matter emission limits for boilers B1 through B3.

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2]

- (a) Pursuant to 326 IAC 6-2-3 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (c)), particulate emissions from boilers B1, B2, and B3 shall be limited to ~~0.8~~, 0.34, ~~and~~ 0.34, **and 0.8** pounds of particulate matter per MM Btu of heat input, **respectively**, by the following equation:

**Response to Comment 15:**

IDEM disagrees. A factor in the calculations used to determine the particulate matter emissions stated above is Q, where Q is the total source maximum operating capacity rating in million Btu per hour

(MMBtu/hr) heat input. When B1 was constructed in July of 1971, Q was 85. Boilers B2 and B3 were constructed in October of 1979, and Q was equal to  $85 + 85 + 78$ . The rule 326 IAC 6-2 becomes more stringent as more boilers are constructed at a source. However, adding the term “respectively” does clarify which limit goes with which boiler. Therefore, Condition D.1.1(a) has been changed as follows:

- (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (c)), particulate emissions from boilers B1, B2, and B3 shall be limited to 0.8, 0.34, and 0.34 pounds of particulate matter per MM Btu of heat input, **respectively**, by the following equation:

**Comment 16:**

A modification is required to condition D.1.4 to correct the sulfur content limitation for Boiler B4. Boiler B4 has a capacity greater than 10 MMBtu per hour and was constructed after the NSPS applicability date of June 9, 1989, therefore, it is subject to this NSPS. Pursuant to this rule, the sulfur dioxide emissions from boiler B4 shall be limited to 0.5 pounds per million Btu of heat input. Boiler B4 shall be deemed in compliance with this rule when using either natural gas or No. 2 distillate fuel oil containing not in excess of 0.05% sulfur. No gases discharged from Boiler B4 shall exhibit greater than 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity.

**Response to Comment 16:**

IDEM disagrees. 40 CFR 60.42c Standard for sulfur dioxide specifically states that an affected facility that combusts oil shall not discharge any gases that contain SO<sub>2</sub> in excess of 0.5 lb per MMBtu heat input; or, as an alternative, an affected facility that combusts oil shall not combust oil that contains greater than 0.5 weight percent sulfur. There is no change to this permit as a result of this comment.

**Comment 17:**

A modification to condition D.1.5(a) should be made to identify the source of the SO<sub>2</sub> emission factors. In addition, since records of fuel usage have been maintained, the final sentence of this condition is unnecessary and should be deleted. We request the following changes:

**D.1.5 Sulfur Dioxide (SO<sub>2</sub>) and Oxides of Nitrogen (NO<sub>x</sub>) PSD Synthetic Minor Limitations [326 IAC 2-2][40 CFR 52.21]**

---

This source is a major PSD source and boilers B1, B2, B3, and B4 shall have the following ~~SO<sub>2</sub> and/or NO<sub>x</sub>~~ limits:

- (a) for boilers B1 and B2;  
(~~a~~)(1) 0.5 lb of SO<sub>2</sub> per MM Btu for distillate oil combustion.  
  
(~~b~~)(2) 1.6 lb of SO<sub>2</sub> per MM Btu for residual oil combustion.

- (c)(3) combined SO<sub>2</sub> emissions from B1 and B2 shall not exceed 245 tons per rolling 12 month average.  $3[(B1 \text{ No. 6 fuel oil usage per month} + B2 \text{ No. 6 fuel oil usage per month}) * (SO_2 \text{ ef (emission factor) for No. 6 fuel})] + [(B1 \text{ No. 2 fuel oil usage per month} + B2 \text{ No. 2 fuel oil usage per month}) * (SO_2 \text{ ef for No. 2 fuel})]$  # an average of 245 tons per 12 consecutive month period rolled on a monthly basis, **where the ef for No. 6 fuel and the ef for No.2 fuel shall be based on the sulfur content of the fuel burned and the AP-42 emission factors for boilers of less than 100 MMBtu/hr from Table 1.3-1 of AP-42 updated September 1998.** ~~For the first twelve months, the limit shall be  $[(3 \text{ usage of No. 6 per each month}) * (SO_2 \text{ ef for No. 6 fuel oil})] + [(3 \text{ usage of No. 2 per each month}) * (SO_2 \text{ ef for No. 2 fuel oil})]$  # 245/Total no. of months for which records have been kept.~~

#### Response to Comment 17:

IDEM agrees. The addition of language concerning the source of the emission factors is clarifying, and the last part of (a)(3) no longer applies as the source is beyond the first 12 months of record keeping. Additionally, the revision of language under (b) clarifies the limits for boiler B4. Condition D.1.5 has been changed as follows:

#### D.1.5 Sulfur Dioxide (SO<sub>2</sub>) and Oxides of Nitrogen (NO<sub>x</sub>) PSD Synthetic Minor Limitations [326 IAC 2-2][40 CFR 52.21]

---

This source is a major PSD source and boilers B1, B2, B3, and B4 shall have the following SO<sub>2</sub>-and/or NO<sub>x</sub>-limits:

- (a) for boilers B1 and B2;

(a)(1) 0.5 lb of SO<sub>2</sub> per MM Btu for distillate oil combustion.

(b)(2) 1.6 lb of SO<sub>2</sub> per MM Btu for residual oil combustion.

- (c)(3) combined SO<sub>2</sub> emissions from B1 and B2 shall not exceed 245 tons per rolling 12 month average.  $3[(B1 \text{ No. 6 fuel oil usage per month} + B2 \text{ No. 6 fuel oil usage per month}) * (SO_2 \text{ ef EF (emission factor) for No. 6 fuel})] + [(B1 \text{ No. 2 fuel oil usage per month} + B2 \text{ No. 2 fuel oil usage per month}) * (SO_2 \text{ ef EF for No. 2 fuel})]$  # an average of 245 tons per 12 consecutive month period rolled on a monthly basis, **where the ef EF for No. 6 fuel and the ef EF for No.2 fuel shall be based on the sulfur content of the fuel burned and the AP-42 emission factors for boilers of less than 100 MMBtu/hr from Table 1.3-1 of AP-42 updated September 1998.** ~~For the first twelve months, the limit shall be  $[(3 \text{ usage of No. 6 per each month}) * (SO_2 \text{ ef for No. 6 fuel oil})] + [(3 \text{ usage of No. 2 per each month}) * (SO_2 \text{ ef for No. 2 fuel oil})]$  # 245/Total no. of months for which records have been kept.~~

**Comment 18:**

Condition D.1.5(b) should be modified to correct the sulfur content limitation for boiler B4, as well as to remove the language relating to the use of No. 6 fuel in this boiler because No. 6 fuel is not burned in this boiler.

**Response to Comment 18:**

IDEM disagrees. Boiler B4 has a sulfur content limit of 0.5% based on 40 CFR 60, Subpart Dc.

Condition D.1.5 shall be changed as follows:

D.1.5 Sulfur Dioxide (SO<sub>2</sub>) and Oxides of Nitrogen (NO<sub>x</sub>) PSD Synthetic Minor Limitations [326 IAC 2-2][40 CFR 52.21]

---

~~(b)~~(b) for boiler B4;

~~(a)~~(1) **No. 2 fuel oil consumption not to exceed a** rolling 12 month average of 516 kgal of No. 2 fuel oil per month at a 0.5% ~~with a~~ sulfur content **not to exceed 0.5%**, and

~~(b)~~(2) rolling 12 month average of 318 kgal of No. 6 fuel oil per month at a 1.6% sulfur content, and

~~(c)~~(3) **natural gas consumption not to exceed a** rolling 12 month average of 72 million cubic feet ~~natural gas~~ per month.

**Comment 19:**

Condition D.1.6 should be deleted since the boilers have no control devices and, therefore, should not be subject to the Preventive Maintenance Plan (PMP) requirements. In addition, the reference to the carbon adsorption recovery system for the boilers is incorrect.

**Response to Comment 19:**

IDEM agrees that the reference to the carbon adsorption recovery system for the boilers is inappropriate, however, IDEM does not agree that the boilers should not have a PMP. The requirements in 326 IAC -5.1 and 326 IAC 2-6.1 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit. IDEM's compliance monitoring guidance states that a compliance monitoring plan is required only for:

- (a) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
- (b) the unit has existing applicable requirements; and
- (c) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
- (d) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
- (e) the unit does not have a control device and has actual emissions exceeding 25 tons per year.

The guidance does not state that if a facility does not meet the above requirements, compliance monitoring will never be necessary, it does state that a compliance monitoring plan is not required to be submitted with the application. In most cases, the requirement to maintain a preventive maintenance plan and perform compliance monitoring has followed the same guidelines as specified above. However, there are some types of operations that the OAQ has determined that compliance monitoring and preventive maintenance plans are necessary to ensure continuous compliance. Therefore the requirement will be maintained as proposed. The reference to the carbon solvent recovery system has been replaced by boilers.

**Comment 20:**

Condition D.1.8(b) should be modified to correctly identify the ratings for boilers B1-B3.

**Response to Comment 20:**

IDEM agrees. Condition D.1.8 (b) shall be changed as follows:

**D.1.8 Sulfur Dioxide Emissions and Sulfur Content**

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Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance for:

- (a) the ninety-eight and four-tenths (98.4) MMBtu per hour boiler B4 utilizing one of the following options:
  - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
  - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
    - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
    - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) the two (2) ~~78~~ **85** MMBtu per hour boilers, B1 and B2, and the one (1) ~~eighty-five (85)~~ **78** MMBtu per hour oil-fueled boiler, B3, are not subject to the requirements of 40 CFR Dc, because they were constructed before the applicability date of the rule (June 9, 1989).

**Comment 21:**

Condition D.1.9 should be modified to clarify that weekly visible emission readings are only required if fuel oil is burned for a period extending more than a week. As currently worded, this condition might be interpreted to require weekly observations regardless of the fuel being burned.

**Response to Comment 21:**

IDEM disagrees. The purpose of the monitoring is to assure continuous compliance, therefore, noting visible emissions during the combustion of fuel oil at least one time each week only if that fuel oil is burned for at least a full week does not assure continuous compliance. If fuel oil is burned at anytime during a week, there should be one visible emission notation performed during fuel oil combustion that week. For clarity, Condition D.1.8 has been reworded as follows:

**D.1.9 Visible Emissions Notations**

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- (a) The Permittee will conduct one visible emission notation during normal operations ~~each period when the boilers are burning No. 2 or No. 6 fuel oil, but no less than at least~~ **once per week for each week during which the respective boiler is operated**. A trained employee or other trained observer shall record whether emissions are normal or abnormal.

**Comment 22:**

D.2 facility description should be modified consistent with the revisions in A.2.

**Response to Comment 22:**

IDEM agrees. See Response to Comment 3.

**Comment 23:**

Conditions D.2.1(b) and (c) should be combined into a single condition since the same requirements apply to all four referenced presses. As a result, Condition D.2.1(c) is no longer required.

**Response to Comment 23:**

IDEM agrees. Condition D.2.1 shall be changed as follows:

**D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8-5-5]**

---

Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations), the publication rotogravure presses shall be controlled by a carbon adsorption solvent recovery system that reduces the volatile organic emissions from the capture system by at least ninety percent (90%) by weight. The capture system shall attain an efficiency sufficient to achieve, at minimum, an overall control efficiency, in conjunction with the emission control system, of seventy-five percent (75%). The specific units are limited as follows:

- (a) rotogravure presses WRO-488 and WRO-489:
- (1) a ducted capture system to the solvent recovery system with total control efficiency of no less than 75% on a monthly basis.
- (b) for rotogravure presses WRO-491 ~~and~~, WRO-492, **WRO-493, and WRO-494**:
- (1) daily adsorber efficiency of no less than 95%,
  - (2) rolling 12 month average of no less than 98% adsorber efficiency, and

(3) PTE (100% capture).

~~\_\_\_\_\_ (c) for rotogravure presses WRO-493 and WRO-494, compliance with this condition satisfies the requirements of NSPS 40 CFR 60, Subpart QQ;~~

~~\_\_\_\_\_ (a) daily adsorber efficiency of no less than 95%;~~

~~\_\_\_\_\_ (b) rolling 12 month average of no less than 98% absorber efficiency, and~~

~~\_\_\_\_\_ (c) PTE (100% capture);~~

**Comment 24:**

Condition D.2.2.(b)(1) should be modified to clarify that the 53.2 tons per month limitation is an average monthly limitation.

**Response to Comment 24:**

IDEM agrees. Condition D.2.2(b)(1) has been changed as follows:

**D.2.2 VOC PSD Synthetic Minor Limits** [326 IAC 2-2] [40 CFR 52.21]

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This source is a major PSD source and the following presses have VOC limits such that PSD rules, 326 IAC 2-2 and 40 CFR 52.21, shall not apply:

(b) for rotogravure press WRO-490;

(1) rolling 12 month average of 4,910 tons per year of VOC input (~~53.2 tons~~  
**average VOC potential to emit of 53.2 tons emissions per 12 consecutive**  
**months with compliance determined at the end of each month**), and

(2) monthly solvent recovery overall efficiency of no less than 87%.

**Comment 25:**

Condition D.2.5 should be modified to more explicitly state which emissions units are subject to the requirements of 40 CFR 60 Subpart QQ and which are excluded from these requirements.

**Response to Comment 25:**

IDEM agrees. Condition D.2.5 has been modified, and Conditions D.2.6 and D.2.8 have been added to address the applicability of the General Provisions of 40 CFR 60 and 40 CFR 63 as follows:

**D.2.5 NSPS Requirements** [326 IAC 12] [40 CFR 60, Subpart QQ]

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(a) Publication Rotogravure Printing [326 IAC 12] [40 CFR 60, Subpart QQ]

(1) Pursuant to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430 through 60.435, Subpart QQ) emissions of volatile organic compounds (VOC) from rotogravure presses WR-429, WR-441, WR-442, WR-443, WR-444, WRO-490, WRO-491, WRO-492,

WRO-493, and WRO-494 shall not be greater than or equal to 16 percent of the total mass of VOC solvent and water used during any one performance averaging period.

- (2) Rotogravure presses WRO-486, WRO-487, WRO-488, and WRO-489 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430 through 60.435, Subpart QQ), because they were constructed before the applicability date of the rule (October 28, 1980).**
- (3) Proof presses WCM-440, WCM-450, and WCM-460 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430 through 60.435, Subpart QQ), because proof presses are specifically exempted from that rule.**

**D.2.6 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]**

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- (a) The provisions of 40 CFR 60, Subpart A, apply to the rotogravure presses WR-429, WR-441, WR-442, WR-443, WR-444, WRO-490, WRO-491, WRO-492, WRO-493, and WRO-494, except when otherwise specified in 40 CFR 60.430 through 60.435, Subpart QQ.**
- (b) The provisions of 40 CFR 60, Subpart A, do not apply to rotogravure presses WRO-486, WRO-487, WRO-488, and WRO-489 or proof presses WCM-440, WCM-450, and WCM-460 because the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430 through 60.435, Subpart QQ) does not apply.**

**D.2.8 General Provisions Relating to NESHAP [326 IAC 14][40 CFR Part 63, Subpart KK]**

**The provisions of 40 CFR Part 63, Subpart A, apply to the publication rotogravure presses, proof presses, cylinder and parts cleaners, ink and solvent mixing and storage equipment, and solvent recovery system, except when otherwise specified in 40 CFR 63.820 through 63.831, Subpart KK.**

**Comment 26:**

A missing section of Condition D.2.9(c), taken from the construction permit for the parts and cylinder washers, should be inserted.

**Response to Comment 26:**

IDEM agrees. Condition D.2.9 (c) has been modified as follows:

**D.2.9 Monitoring to Demonstrate Continuous Compliance [326 IAC 14][40 CFR Part 63, Subpart KK]**

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- (c) At all time that the carbon adsorption control system for the parts and cylinder washers is in operation and being utilized to demonstrate**

compliance with the VOC emission limitations, the control system shall be monitored using the inlet **and outlet analyzers on the solvent recovery system and monitoring the** pressure differential in the enclosure to meet permanent total enclosure requirements.

**Comment 27:**

Under Condition D.2.11, the equipment included in this section is subject to the monthly mass balance requirements of 40 CFR Subpart QQ and 40 CFR 63 Subpart KK; the solvent adsorption system is equipped with inlet and outlet analyzers that document the daily system performance; and the permanent total enclosures are outfitted with pressure gauges that confirm that the PTE requirements are met on an ongoing basis, there does not appear to be a sufficient justification for requiring retesting every 2 and ½ years as currently specified in the draft permit. We are requesting that IDEM revise this condition to require a testing frequency of no more often than every five years. This is the same frequency that IDEM has provided in other Title V permits. Additionally, the reference to test methods in 40 CFR 60.433 is incorrect and should be deleted.

**Response to Comment 27:**

Upon further research, the requirements of 40 CFR 60, Subpart QQ, and 40 CFR 63, Subpart KK, allows the source to demonstrate compliance on a monthly basis using liquid liquid balance. Both Subparts state that if liquid liquid balance is used to show compliance, then stack testing is not required. Therefore, because the source is using the liquid liquid balance to determine compliance as listed under the Condition D.2.11(a)(previously Condition D.2.9(a)), IDEM agrees that the testing requirement is inappropriate. Condition D.2.11 has been deleted.

~~D.2.11 Testing Requirements [326 IAC 2-7-6(1)]~~

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~~Compliance stack tests shall be performed for the carbon adsorption solvent recovery system and the ducted solvent capture system used to achieve compliance with 326 IAC 8-5-5, 326 IAC 2-2, NSPS Subpart QQ, and NESHAP Subpart KK. Initial stack tests shall be performed on the carbon adsorption solvent recovery system and the ducted solvent capture system associated presses WRO-493 and WRO-494 within 180 days of start-up. Initial performance testing shall be conducted for WRO-493 and WRO-494 using the test methods specified in §63.827 and §60.433. The carbon adsorption solvent recovery system and the ducted solvent capture system shall be tested every two and one half (2 ½) years to determine the capture efficiency and the overall control efficiency for these control systems and compliance with the emission limits specified in Conditions D.2.1, D.2.2, D.2.3, and D.2.4.~~

**Comment 28:**

The facility description under D.3 should be modified to be consistent with Section A.2.

**Response to Comment 28:**

IDEM agrees. See Response to Comment 3.

**Comment 29:**

The emission limitation in Condition D.3.3.(b) should be corrected to reflect the regulatory requirement of 0.015 mg/dscm.

**Response to Comment 29:**

IDEM agrees. Condition D.3.3(b) should be changed as follows:

**D.3.3 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)]**

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- (b) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from tanks by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed one-hundredth milligrams of total chromium per dry standard cubic meter of ventilation air (0.015 mg/dscm) [equivalent to ~~four six~~ and ~~four six~~-tenths times ten raised to the power of negative six grains of total chromium per dry standard cubic foot of ventilation air (~~4.46.6~~ $\times 10^{-6}$  gr/dscf)].

**Comment 30:**

The operation and maintenance plan requirements of 40 CFR 63, Subpart N, as outlined in Condition D.3.6, contains a detailed set of requirements for inspection, cleaning and response to upset conditions. Requiring a separate Preventive Maintenance Plan under Condition D.3.5 is unnecessary and unwarranted. Compliance with Condition D.3.6 should satisfy requirements under D.3.5.

**Response to Comment 30:**

IDEM, OAQ agrees that the requirements of the OMP meet the requirements of the PMP. Therefore, Condition D.3.5 is deleted, and D.3.6 (f) has been added:

~~D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

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~~A Preventive Maintenance Plan (PMP), in accordance with Section B Preventive Maintenance Plan, of this permit, is required for tanks CRT-1 and CRT-2 and the composite mesh pad system and hepafilter.~~

**D.3.65 Operation and Maintenance Plan [326 IAC 14] [40 CFR 63.342(f)(3)]**

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- (f) **Compliance with the requirements of this OMP satisfies the requirements of the Preventive Maintenance Plan (PMP) required under 326 IAC 2-7-5 (13).**

**Comment 31:**

Under Condition D.3.8(b), we see no need or value for including this definition of operating time in the permit. We request that D.3.8, and the reference to this condition in Condition D.3.9(j), be deleted.

**Response to Comment 31:**

IDEM agrees. Condition D.3.8(b) and D.3.9(j) shall be changed as follows:

**D.3.7 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 63.343(c)]**

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- ~~(a)~~ Pursuant to 40 CFR 63.343(c)(1)(ii), when using a composite mesh-pad system to comply with the limit specified in Condition D.3.3, the Permittee shall monitor and record the pressure drop across the composite mesh-pad system during tank operation once each day that ~~the decorative~~ **either** chromium electroplating tank is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within  $\pm 1$  inch of water column of the pressure drop value established during the initial performance test, or within the range of compliant values for pressure drop established during multiple performance tests.
- ~~(b)~~ Tank operation or operating time is defined as that time when a part is in the tank and there is a current running through the tank. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) is less than fifteen minutes, that time between plating the two parts is considered operating time.

**D.3.9 Record Keeping Requirements [326 IAC 2-7-5(3)] [40 CFR 63.346]**

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- (j) The total process operating time, ~~as defined in Condition D.3.8(b)~~, of each tank, during the reporting period.

**Comment 32:**

The language following Condition D.3.10(c)(2), relating to semiannual reports, is redundant since 40 CFR 63 Subpart N already requires these reports to be submitted semiannually. We request this portion of the condition be deleted.

**Response to Comment 32:**

IDEM disagrees. Renumbered Condition D.3.9(c)(2) states "If the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c) show that the emission limit has been exceeded, quarterly reports shall be submitted. Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted quarterly until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved." This is a requirement for quarterly reporting due to the emission limit

being exceeded pursuant to 40 CFR 63.347(g)(ii). There is no change to the permit as a result of this comment.

**Comment 33:**

The facility description under D.4 should be modified to be consistent with Section A.2.

**Response to Comment 33:**

IDEM agrees. See the Response to Comment 3.

**Comment 34:**

Under Condition D.4.1, the pneumatic paper dust and trim collection systems located in the east and west plants consist of a number of interconnected and interdependent components, where the airflow through the systems may discharge through various combination of cyclones, cyclone concentrators, or baghouses. In order to obtain the maximum value for the recovered paper (which we collect for recycling), it is necessary to separate various grades of paper. To do so, alternative operating scenarios are implemented in the operation of the cyclones to direct paper to the proper baler (via a combination of cyclone and cyclone concentrators). Therefore, we request that IDEM revise the TSD and the draft TV permit as indicated to limit each system as a whole based upon process weight limitations, rather than regulating the capacities of the component parts. We further request that the TSD and draft TV permit indicate that operation of the system in this fashion is an alternative operating scenario in accordance with 326 IAC 2-7-5(9), where no prior notification of IDEM, OAQ or U.S. EPA is required.

The west plant system, comprising WPC01, WPC-2, WPCON-3, WPCON-4, and WPBH, is capable of processing 21.05 tons of paper per hour. An overall allowable PM limit of 31.6 pounds per hour for the entire west plant system is more appropriate than the individual limits for these cyclones and baghouse.

Similarly, the east plant system, consisting of EPC-1, EPC-2, EPC-3, EPC-4, EPCON-5, EPCON-6, EPBH-C, EPBH-D, and EPBH-E is capable of producing 10.19 tons of paper per hour. An overall allowable PM limit of 20.3 pounds per hour for the entire east plant system is a more appropriate limit than the individual limits for these cyclones and baghouses, will provide the necessary flexibility for alternative operating scenarios, and accurately reflects current operations.

**Response to Comment 34:**

IDEM agrees. Condition D.4.1 has been changed as follows:

**D.4.1 Particulate Matter (PM) [326 IAC 6-3]**

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- (a)** Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the pneumatic paper dust and trim collection **in the east plant** system shall not exceed allowable PM emission rate of **20.3 pounds per hour based on a process weight**

**rate of 10.19 tons of paper per hour using** the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per}$$

hour; and

$P$  = process weight rate in tons per hour

- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the pneumatic paper dust and trim collection in the west plant system shall not exceed allowable PM emission rate of 31.6 pounds per hour based on a process weight rate of 21.05 tons of paper per hour using the following equation:**

**Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:**

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in}$$

pounds per hour; and

$P$  = process weight rate in tons per hour

Emission Unit	Allowable Limit (lb/hr)
WPG-1	46.5
WPG-2	45.4
WPCON-3 & WPBH	3.53
WPCON-4	42.5
EPC-1	42.69
EPC-2	2.22
EPC-3 & EPBH-C	40.72
EPCON-5, EPCON-6, & EPBH-E	3.40
EPC-4 & EPBH-D	2.22

#### **Comment 35:**

We request that section D.4.4 be deleted. As explained above, pneumatic paper dust and trim collection systems, which includes trimmers, cyclones, cyclone concentrators, and baghouses, are interdependent component parts that make up the pneumatic dust and trim collection system. Thus, the statement in the draft TV that these parts shall be in operation confuses the point that it is inherent to the collection system efficiency to operate these component parts together or in some combination.

#### **Response to Comment 35:**

IDEM agrees that this is a pneumatic system and the condition shall be deleted and the all subsequent conditions have been renumbered accordingly.

**Comment 36:**

We request that Condition D.4.6(a) be revised consistently with the discussion in the TSD, that weekly visible emissions notations, not daily, are required.

**Response to Comment 36:**

IDEM agrees. D.4.6(a) now D.4.4 (a) has been changed as follows:

**D.4.4 Visible Emissions Notations**

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- (a) Weekly ~~Daily~~ visible emission notations of the pneumatic paper dust and trim collection systems stack exhausts, from WPC-1, WPC-2, WPCON-4, EPC-1, EPC-3 & EPBH-C, shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee or other trained observer shall record whether emissions are normal or abnormal.

**Comment 37:**

We request revision of Condition D.4.9(a) now D.4.7 (a) to reflect weekly requirement for visible inspection of the pneumatic dust and trim collection systems.

**Response to Comment 37:**

IDEM agrees. Condition D.4.7(a) has been changed as follows:

**D.4.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.4.6 4, the Permittee shall maintain records of **weekly daily** visible emission notations of the pneumatic paper dust and trim collection systems stack exhaust.

**Comment 38:**

The concluding portion of condition D.4.9(b), relating to dates that vents are redirected, is unclear. We request its deletion. As explained above, in this section, Donnelley is requesting a permit condition that provides for the alternate operating scenarios necessary to operate the trim and dust collection systems most efficiently, depending upon the paper batch. As such, there is no legally applicable requirement to record dates that vents are redirected.

**Response to Comment 38:**

IDEM agrees. Condition D.4.9(b) now D.4.8 (b) has been changed as follows:

- (b) To document compliance with Condition D.4.1, the Permittee shall maintain records of the results of the inspections required under Condition D.4.47 ~~and the dates the vents are redirected.~~

**Comment 39:**

We request that the Form “Part 70 Operating Permit Natural Gas Fired Boiler Certification” be deleted from the permit. This form provides no information not covered by the other reporting forms and requirements of the permit.

**Response to Comment 39:**

IDEM disagrees. Boilers, when burning natural gas, are not required to perform compliance monitoring. The certification of times when the Boiler is burning natural gas assures IDEM that no monitoring is necessary to assume continuous compliance.

Upon further review, the OAQ has decided to make the following revisions to the permit. The Table Of Contents has been modified to reflect these changes.

1. B.2 Permit Term has a new rule cite added to incorporate the Article 2 rule revisions that were adopted on October 3, 2001, and become effective on January 19th, 2002.

B.2 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

2. Compliance with Permit Conditions has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the Permittee, an action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the Permittee's application to renew the permit. In addition, except for those permit conditions that are not federally enforceable, noncompliance is also a violation of the federal Clean Air Act.

**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit ~~except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:~~

- (1) Enforcement action;
- (2) Permit termination, revocation and reissuance, or modification; or
- (3) Denial of a permit renewal application.

- (b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.**

- (c)** It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance

with the conditions of this permit.

- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

3. B.12 Emergency Provisions (a)(b) and (g) have been revised to incorporate the Article 2 rule revisions that were adopted on October 3, 2001, and become effective on January 19th, 2002. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only.

**B.12 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, ~~except as provided in 326 IAC 2-7-16.~~
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (g) ~~Operations may continue during an emergency only if the following conditions are met:~~

~~(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

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~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

4. B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed, because it conflicted with 40 CFR 70.6(a)(6).

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

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~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

5. B.14 Prior Permits Superseded was added to the permit to implement the intent of the new rule 326 IAC 2-1.1-9.5 under the Article 2 rule revisions that were adopted on October 3, 2001, and become effective on January 19th, 2002.

**B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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**(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either**

**(1) incorporated as originally stated,**

**(2) revised, or**

**(3) deleted**

**by this permit.**

**(b) All previous registrations and permits are superseded by this permit.**

6. Remove (b) from B.13 Permit Shield. Since B.14 Prior Permits Superseded has been added to the permit, it is not necessary for this statement to be in this condition.

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

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~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

7. Prompt Reporting of Deviations: EPA made it clear that if there is a requirement to do

something in a permit, then it is a deviation when the source does not do it [see 40 CFR 70.6(a)(6)(i)]. IDEM, OAQ, is allowed to use enforcement discretion in these cases, but we cannot create an exemption through the TV permit. IDEM, OAQ, revised D.2.5 Parametric Monitoring (and all other parametric monitoring conditions) to clarify the facility specific events that would not qualify as a deviation.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

**The notification by the Permittee Quarterly Deviation and Compliance Monitoring Report** does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee’s failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

8. **Certification by Responsible Official** Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM has re-visited this issue with EPA. C.8 has been clarified so that the Permittee understands that the asbestos notification should be certified by the owner or operator and not the responsible official. C.18 now requires a certification by the R.O. for the notification sent in response to non-compliance with a stack test.

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C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

**The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.** The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

9. C.17 Compliance Response Plan - Failure to Take Response Steps (c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed under the Article 2 rule revisions that were adopted on October 3, 2001, and become effective on January 19th, 2002.. Requests that do not involve

significant changes to monitoring, reporting, or recordkeeping requirements may now be approved as minor permit modifications.

C.17 Compliance ~~Monitoring~~ **Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports** [326 IAC 2-7-5] [326 IAC 2-7-6]

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- (a) The Permittee is required to **prepare** ~~implement: a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

- ~~(1) This condition;~~
- ~~(2) The Compliance Determination Requirements in Section D of this permit;~~
- ~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~
- ~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
- (5) ~~A~~ **a** Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **A** CRP's shall be submitted to IDEM, OAQ upon request ~~and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, and maintained on site, and is comprised of:~~
- ~~(A)~~**(1)** Reasonable response steps that may be implemented in the event that compliance-related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and **an expected timeframe for taking reasonable response steps.**
- ~~(B)~~ A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.**
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or**
- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**
- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**
- (4) Failure to take reasonable response steps shall constitute a violation of the permit.**
- (c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The** Permittee is ~~excused from taking~~ **not required to take any** further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.**
- (2) The Permittee has determined that the compliance monitoring parameters**

established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.

- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

**(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**

**(d)(e)** Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**(e)(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed at all times when the equipment emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.** If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

**(f)** ~~At its discretion, IDEM may excuse the Permittee’s failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

10. The following typo was corrected.

**D.1.10 Record Keeping Requirements**

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- (a)** To document compliance with Conditions D.1.2, D.1.3, **D.1.4, and** D.1.5;

~~and D.1.7~~, the Permittee shall maintain records in accordance with (1) through (6) below.

- (b) To document compliance with Condition **D.1.9 8**, the Permittee shall maintain records of the visible emission notations of the boilers stack exhaust.

11. A source modification No. 085-15579-00009 was issued on June 20, 2002, which needs to be incorporated into the Title V operating permit, T085-6040-0009, before its issuance. The following changes have been made as a result of the source modification.

The description under A.1 and D.4 have been changed as follows:

- (j) One (1) pneumatic paper trim collection system located in the west plant and consisting of:
- (1) One (1) cyclone, identified as WPC-1, installed in June of 1969,
  - (2) One (1) cyclone, identified as WPC-2, installed in June of 1969,
  - (3) One (1) cyclone concentrator, identified as WPCON-3, installed in August of 1993, **modified in June 2002**, with concentrated paper sent **primarily** to a cyclone, WPC-1 or **secondarily to WPC-2**, exhausting to one (1) baghouse, WPBH, installed in August of 1993,
  - (4) One (1) baghouse, identified as WPBH, with collected dust sent to cyclone, WPC-1 or WPC-2, with air exhausting to the bindery,
  - (5) One (1) cyclone concentrator, identified as WPCON-4, installed in August of 1993, **modified June 2002, which has a maximum capacity of 10,500 pounds per hour**, with concentrated paper sent **primarily** to cyclone WPC-1, or **secondarily to WPC-2**,
  - (6) One (1) cyclone concentrator, identified as WPCON-5, installed in June 2002, which has a maximum capacity of 10,500 pounds per hour, with concentrated paper sent primarily to cyclone WPC-1, or secondarily to WPC-2.**

Section D.4 conditions have been revised as follows:

#### D.4.1 Particulate Matter (PM) [326 IAC 6-3]

- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the ~~pneumatic paper dust and trim collection~~ **three (3) waste paper paper concentrators** in the west plant system, **WPCON- 3, WPCON-4, and WPCON-5, and the two (2) cyclones, WPC-1 and WPC-2**, shall not exceed allowable PM emission rate of ~~31.6~~ **26.00** pounds per hour based on a process weight rate of ~~24.05 tons~~ **31,500 pounds** of paper per hour using the following equation:  
Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:  
$$E = 4.10 P^{0.67}$$
 where E = rate of emission in pounds per

hour; and

P = process weight rate in tons per hour

#### **D.4.2 PSD Limit [326 IAC 2-2][40 CFR 52.21]**

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- (a) PM and PM-10 emissions from the three (3) waste paper concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 and the two (2) cyclones WPC-1 and WPC-2, shall be limited to 1.0 lb/ton and 0.6 lb/ton, respectively. Compliance with these limits shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable and also satisfy the requirement of Condition D.1.1.**
- (b) Any change or modification to the three (3) waste paper concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 and the two (2) cyclones WPC-1 and WPC-2, that may increase potential emissions to greater than twenty-five (25) tons per year of PM, or fifteen (15) tons per year of PM-10, must have prior approval from the Office of Air Quality.**
- (c) The input of paper to the three (3) waste paper concentrators, identified as WPCON-3, WPCON-4 and WPCON-5 and the two (2) cyclones WPC-1 and WPC-2, shall be limited to less than 25,000 tons per twelve (12) consecutive month period, rolled on a monthly basis. This usage limit is required to limit the potential to emit of PM to less than 25 tons per 12 consecutive month period and PM10 to less than 15 tons per 12 consecutive month period. Compliance with this limit shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.**

#### **~~Compliance Determination Requirements~~**

#### **~~D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]~~**

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~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

#### **~~D.4.3 Source Limitation [326 IAC 6-3]~~**

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~~The input of waste paper to the following emission units shall be limited as follows:~~

- ~~(a) WPCON-4 shall be limited to 1,858 tons per month on a rolling 12 month average;~~
- ~~(b) WPC-2 shall be limited to 2,154 tons per month on a rolling 12 month average;~~

#### **D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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**A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.**

#### **D.4.5 Baghouse Cyclone Inspections**

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~~An inspection shall be performed monthly and shall consist of:~~

- ~~— (c) — Checking if the pressure differential is within acceptable range;~~
- ~~— (d) — Confirm the filter blast operation for each baghouse;~~
- ~~— (e) — Confirm the corner/eye blast operation for each baghouse;~~
- ~~— (f) — Check for compressed air leaks;~~
- ~~— (g) — Complete a visual emission notation as listed in items (1) through (4) above.~~
- ~~— All defective bags shall be replaced as soon as possible following detection, as prescribed in the preventive maintenance plan required by Condition D.4.2 and as required by Condition D.4.6.~~

**An inspection shall be performed each calendar quarter of the two (2) cyclones (WPC-1 and WPC-2) and the three (3) waste paper concentrators (WPCON-3, WPCON-4, WPCON-5) when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.**

#### **D.4.6 Broken Bag or Cyclone Failure Detection**

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In the event that bag failure has been observed:

- (a) Within eight (8) hours of the determination of failure, response steps including a timetable for completion shall be devised.

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.4.7 Record Keeping Requirements**

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- (a) **To document compliance with D.4.2(c), the Permittee shall maintain monthly records of paper throughput to the three (3) waste paper concentrators (WPCON-3, WPCON-4, and WPCON-5), and the two (2) cyclones (WPC-1 and WPC-2).**
- (b) To document compliance with Condition D.4.4, the Permittee shall maintain records of ~~weekly~~ **daily** visible emission notations of the ~~pneumatic paper dust and trim collection~~ **waste paper collection** system stack exhaust.
- (c) To document compliance with Condition ~~D.4.4~~ **D.4.5**, the Permittee shall maintain records Of the results of the inspections required under Condition D.4.5 **and the dates the vents are redirected.**
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.4.8 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.4.3 ~~2~~(c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the report forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

August 5, 2002

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a Part 70 Operating Permit**

**Source Background and Description**

Source Name: R.R. Donnelley & Sons Company - Warsaw Manufacturing Division  
Source Location: 2801 West Old Route 30, Warsaw Indiana 46581-0837  
County: Kosciusko  
SIC Code: 2754  
Operation Permit No.: T085-6040-00009  
Permit Reviewer: Holly M. Stockrahm

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from R.R. Donnelley & Sons Company - Warsaw Manufacturing Division relating to the operation of publication rotogravure printing.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) Four (4) natural gas or No. 2 or No. 6 oil fired boilers with emissions exhausting to stack 1/1, described as follows:
  - (1) B1 and B2, installed in July of 1971 and October 1979, respectively, each with a maximum rated capacity of 85 MMBtu/hr,
  - (2) B3, installed in October of 1979, with a maximum rated capacity of 78 MMBtu/hr,
  - (3) B4, installed in June of 1994, with a maximum rated capacity of 98.4 MMBtu/hr.
- (b) Fourteen (14) publication rotogravure printing presses, each using a carbon adsorption solvent recovery system with seventeen (17) adsorbers as control, exhausting to stack 2/2, described as follows:
  - (1) WR-429, installed in September of 1985, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute, and enclosed by permanent total enclosure (PTE),
  - (2) WRO-486, installed in December of 1970, with a maximum printing width of 69 inches and a maximum line speed of 1600 feet per minute,
  - (3) WRO-487, installed in December of 1971, with a maximum printing width of 69 inches and a maximum line speed of 2000 feet per minute,
  - (4) WRO-488 and WRO-489, installed in March of 1979 and September of 1978, respectively, with each press having a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute,
  - (5) WRO-490, installed in July of 1990, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2756 feet per minute,
  - (6) WRO-491, WRO-492, WRO-493, WRO-494, installed in August of 1994, February of 1995, November of 1995, and November of 1995, respectively, with each press having a maximum printing width of 125 inches and a maximum line speed of 3000 feet per minute, and enclosed by permanent total enclosure (PTE). WRO-493 and WRO-494 are pre-approved presses at the time of this permit issuance.

- (7) WR-444, installed in December of 1996, with a maximum printing width of 78 3/4 inches and a maximum line speed of 2450 feet per minute, and, although not required by rule, enclosed by permanent total enclosure (PTE),
- (8) WR-441, WR-442, WR-443, installed in December of 1996, with each press having a maximum printing width of 78 3/4 inches and a maximum line speed of 2450 feet per minute, and enclosed by permanent total enclosure (PTE),
- (c) Two (2) rotogravure proof presses, using the carbon adsorption solvent recovery system described above as control, exhausting to stack 2/2, described as follows:
  - (1) WCM-450, installed in September of 1994, with a maximum printing width of 125 inches and a maximum line speed of 900 feet per minute,
  - (2) WCM-460, installed in December of 1993, with a maximum printing width of 78 inches and a maximum line speed of 600 feet per minute,
- (d) One (1) gravure cylinder wash machine, identified as GCW, installed in April of 1995, located in the east plant and exhausting to stack 3/4.
- (e) One (1) gravure parts press parts washer, identified as GPW, installed in 1991, located in the east plant, and exhausting to stack 3/4.
- (f) One (1) gravure cylinder wash machine, identified as WCWM, installed in May of 2000, located in the east plant, using the carbon adsorption solvent recovery system and enclosed by permanent total enclosure (PTE) and exhausting to stack 2/2.
- (g) One (1) gravure press parts washer, identified as WGPW, installed in May of 2000, located in the east plant, enclosed by permanent total enclosure (PTE) and exhausting to stack 2/2.
- (h) Two (2) chromium plating lines, CRT-1 and CRT-2, installed in September of 1994, using a composite mesh pad system with a hepafilter as control, each having two (2) rectifiers with a maximum combined capacity of 10,000 amps, exhausting to stack 5,
- (i) One (1) pneumatic dust and paper trim collection system located in the east plant and consisting of:
  - (1) One (1) cyclone, identified as EPC-3, installed in May of 1994, exhausting to one (1) baghouse, identified as EPBH-C, installed in June of 1994, which exhausts to stack 3/4,
  - (2) One (1) cyclone, identified as EPC-1, installed in 1978, exhausting to stack 3/4,
  - (3) One (1) cyclone, identified as EPC-2, installed in 1978, exhausting to stack 3/4,
  - (4) One (1) concentrator, identified as EPCON-5, installed in June of 1995, with concentrated paper sent to cyclone, EPC-1, exhausting to one (1) baghouse, EPBH-E, installed in June of 1995, which exhausts stack 3/4.
  - (5) Three (3) baghouses, identified as EPBH-C, EPBH-D, installed in June of 1994, and EPBH-E, with collected dust sent to one (1) dust concentrator, identified as EPCON-6, installed in June of 1995, exhausting to stack 3/4.
  - (6) One (1) concentrator, identified as EPCON-6, with concentrated paper sent to one (1) cyclone, EPC-4, installed in May of 1994, or to one (1) concentrator, EPCON-5,

- with air exhausting to one (1) baghouse, EPBH-E, which exhausts to stack 3/4.
- (7) One (1) cyclone, identified as EPC-4, with air exhausting to one (1) baghouse, EPBH-D, which exhausts to stack 3/4.
- (j) One (1) pneumatic paper trim collection system located in the west plant and consisting of:
- (1) One (1) cyclone, identified as WPC-1, installed in June of 1969, exhausting to stack 3/4
- (2) One (1) cyclone, identified as WPC-2, installed in June of 1969, exhausting to stack 3/4.
- (3) One (1) concentrator, identified as WPCON-3, installed in August of 1993, with concentrated paper sent to a cyclone, WPC-1 or WPC-2, exhausting to one (1) baghouse, WPBH, installed in August of 1993, which exhausts to stack 3/4.
- (4) One (1) baghouse, identified as WPBH, with collected dust sent to cyclone, WPC-1 or WPC-2, with air exhausting to the bindery.
- (5) One (1) concentrator, identified as WPCON-4, installed in August of 1993, with concentrated paper sent to cyclone, WPC-1 or WPC-2, either exhausting to stack 3/4.
- (k) Six (6) cylinder making finishing sinks located in the west plant, identified as EPFS-1 through EPFS-6, installed in September of 1994, exhausting to stack 2/3.
- (l) One (1) wastewater treatment system located in the east plant and consisting of:
- (1) One (1) 3000 gallon solvent/water separator, identified as WWT-1, installed in 1996, exhausting to stack 3/4.
- (2) One (1) 1000 gallon solvent/water separator, identified as WWT-2, installed in 1985, exhausting to stack 3/4.
- (3) One (1) 17,800 gallon air sparging tank, identified as WWT-3, installed in 1985, exhausting to stack 3/4.
- (m) One (1) cylinder making cleaning station located in the east plant, identified as EPCS, installed in September of 1994, exhausting to stack 2/3.
- (n) One (1) cylinder making finishing sink station located in the west plant, identified as WPFS-1, installed in April of 1990, exhausting to stack 2/3.
- (o) Thirty-seven (37) storage tanks, installed in dates ranging from 1960 through 1989, (specific dates are discussed in the Technical Support Document), exhausting to stack 2/2.

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

#### **New Emission Units and Pollution Control Equipment Receiving Prior Approval**

There are no new facilities requiring prior approval.

### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (c) Combustion source flame safety purging on startup.
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (f) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (i) Closed loop heating and cooling systems.
- (j) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (k) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility.
- (l) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (m) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (n) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (o) Heat exchanger cleaning and repair.
- (p) Process vessel degassing and cleaning to prepare for internal repairs.
- (q) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

- (r) Paved and unpaved roads and parking lots with public access.
- (s) Asbestos abatement projects regulated by 326 IAC 14-10.
- (t) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment
- (u) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (v) Diesel generators not exceeding 1600 horsepower.
- (w) Stationary fire pumps.
- (x) Purge double block and bleed valves.
- (y) Filter or coalescer media changeout.
- (z) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (aa) Activities or categories of activities with individual HAP emissions not previously identified. Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.
  - (1) Paster glue, that contains methanol, which is used to splice together webs of paper on each of the production printing presses.
  - (2) 4000 gallon anti-freeze (ethylene glycol) storage tank (normally empty, used for storage only when piping system is drained).
  - (3) 1000 gallon anti-freeze (ethylene glycol) storage tank (material withdrawn on an as-needed basis for make-up).
- (bb) Storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC.
- (cc) A paper auger, silo, and baghouse (EPBH-F) system used to move and store paper dust prior to recycling, with potential emissions of particulate matter (aerodynamic diameter less than or equal to ten (10) micrometers (PM<sub>10</sub>)), less than five (5) pounds per hour and twenty-five pounds per day.
- (dd) Two (2) fuel oil storage tanks (containing No. 2 or No. 6 fuel oil), identified as FOS-1 (3,000 gallon capacity) and FOS-2 (1,000 gallon capacity).

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP 43-07-88-0199, issued on October 23, 1984;
- (b) OP 43-07-88-0200, issued on October 23, 1984;
- (c) OP 43-07-88-0201, issued on October 23, 1984;
- (d) OP 43-07-88-0202, issued on October 23, 1984;
- (e) OP 43-07-88-0207, issued on January 14, 1986;
- (f) OP 2300-0009-0219, issued on July 18, 1990
- (g) CP 085-3117, ID 085-00009, issued on December 10, 1993;
- (h) CP 085-3698, ID 085-00009, issued on June 30, 1994;

- (i) CP 085-4396, ID 085-00009, issued on November 27, 1995;
- (j) CP 085-6372, ID 085-00009, issued on December 6, 1996;
- (k) Modification 085-8155 to CP 085-6372, ID 085-00009, issued on June 2, 1997;
- (l) CP 085-8550, ID 085-00009, issued on September 18, 1997;
- (m) OP 085-10668-00009, issued July 23, 1999;
- (n) SSM085-10668-00009, issued on May 16, 2000;
- (o) SSM 085-11652-00009, issued on March 31, 2000; and
- (p) AA 085-12261-00009, issued on August 8, 2000.

All conditions from previous approvals were incorporated into this Part 70 permit, except for the following:

- (a) Under OP 43-07-88-0200, issued on October 23, 1984, OP 43-07-88-0201, issued on October 23, 1984, and OP 43-07-88-0202, issued on October 23, 1984, the boilers identified as B5, B6, and B7 (now B1, B2 and B3) were permitted to use natural gas with No. 6 fuel oil as back up fuel. The source wishes to use No. 2 fuel oil as backup as well as No. 6. This change causes no increase in potential emissions.
- (b) Under OP 43-07-88-0207, issued on January 14, 1986, the description of what was being permitted is as follows:  
"the rotogravure publication printing press, designated WR-429 (see Construction Permit PC (43) 1574), volatile organic compounds from which are controlled by a carbon adsorption solvent recovery system with a measured control efficiency of 98.5%. The solvent recovery system is used in conjunction with a measured efficiency of 87.8%."

The source wishes to modify this language so that the Title V contains only the applicable rule requirement. This change is to the description only and does not require New Source Review. OAQ will describe press WR-429 as follows:

"Fourteen (14) publication rotogravure printing presses, each using a carbon adsorption solvent recovery system with seventeen (17) adsorbers as control, and exhausting to stack 2/2:

- (1) WR-429, a tandem press with a maximum printing width of 70 inches and a maximum line speed of 2460 feet per minute, and enclosed by permanent total enclosure (PTE),"
- (c) Under CP 085-3117, ID 085-00009, issued on December 10, 1993,
  - (1) The last sentence of Operation Condition No. 12 states, "Satisfaction of this condition and Operation Condition 10 shall be deemed to satisfy 326 IAC 8-5-5." Conditions 10 and 12 are conditions concerning a proof press, and proof presses are not subject to 326 IAC 8-5-5. Therefore, this sentence will be deleted.
  - (2) Operation Condition No. 15 states: "That emissions from the chromium plating operations shall not exceed 0.013 milligrams of hexavalent chromium per cubic meter of air exhausted from each mist eliminator."

This permit was issued based on the proposed NESHAP for chromium emissions from hard chromium electroplating. This standard was subsequently issued in its final form on January 25, 1995, with the limit set in 40 CFR 63.342(c)(1)(i) at "0.015 milligrams of total chromium per dry standard cubic foot (mg/dscf) of ventilation air (6.6 X 10<sup>-6</sup> grains per dry standard cubic foot (gr/dscf)." Therefore, the allowable emission limit shall be changed. (A performance test demonstrating initial compliance for CRT-1 and CRT-2 was performed on April 16-18, 1996. It was determined that the average pressure drop across the composite mesh pad system was 6.10 inches of water, the average pressure drop across the hepafilter was 3.30 inches of water, and the average outlet chromium concentration is

0.0012 mg/dscm.)

- (3) The first sentence of Operation Condition No.16 states that:  
"Pursuant to 326 6-3, particulate emissions from the cyclone controlling particulate emissions for the paper baler shall not exceed 1.3 pounds per hour."

The process weight rate for this baler was 100 tons per day which is equal to 4.2 tons per hour, therefore, interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$\begin{aligned} E &= 4.10 P^{0.67} & \text{where } E &= \text{rate of emission in pounds per hour and} \\ E &= 4.1(4.2)^{0.67} & P &= \text{process weight rate in tons per hour} \\ E &= 10.72 \text{ lb PM/hr} \end{aligned}$$

Therefore, the allowable emission limit shall be changed.

- (4) The second sentence of Operation Condition No. 16 states that:  
"The baler and cyclone shall be considered in compliance with this rule as long as visible emissions from the cyclone exhaust do not exceed 20 % opacity."

Compliance monitoring including visible emissions notations and weekly cyclone inspections shall be used to determine compliance. The source opacity requirements shall be specified pursuant to 326 IAC 5-1-2.

- (d) Under CP085-6372-00009, issued December 6, 1996, and modified on June 2, 1997, Operation Condition No. 8 states:  
That the input of the ink to the production press WR-444, and the proof press WCM-460; and production presses WR-441, WR-442, and WR-443 shall be limited to 354, and 1,074 tons per month, respectively, rolled on a 12 month basis. This production limitation is equivalent to 399 tons of VOC emissions per year, rolled on a 12 month basis. During the first 12 months of operation, the input of the ink usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed the limit specified. After 12 months of operation, the input of the ink usage shall be determined each month such that the total usage for the most 12 month period divided by 12 shall not exceed the limit specified. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

The ink input limits discussed in the first sentence of the condition shall be converted to VOC input based on 73.5% VOC content in the inks used. The limits shall be 260 tons of VOC input per month to the production press WR-444 and the proof press WCM-460; and 789 tons of VOC input per month to the production presses WR-441, WR-442, and WR-443, rolled on a 12 month basis. This production limitation is equivalent to 399 tons of VOC emissions per year, rolled on a 12 month basis.

## Enforcement Issue

There are no enforcement actions pending.

## Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and

additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on June 3, 1996. A notice of completeness letter was mailed to the source on May 30, 1997.

### Emission Calculations

The potential emissions from the two (2) chromium plating lines have been recalculated as follows to determine rule applicability:

Total installed rectifier capacity = 5000 amperes + 5000 amperes = 10000 amperes

Maximum potential operating schedule = 8400 hours per year

Electrodes energized 70% of the total operating time

Maximum cumulative potential rectifier capacity = 10000 amperes \* 8400 hr/yr \* 0.7 = 58,800,000 amp-hr/yr

### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	less than 250
PM-10	less than 250
SO <sub>2</sub>	less than 250
VOC	greater than 250
CO	less than 250
NO <sub>x</sub>	less than 250

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
xylene	greater than 10
toluene	greater than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	11.152
PM-10	1.592
SO <sub>2</sub>	0.155
VOC	459.3
CO	8.75
NO <sub>x</sub>	35
HAP	greater than 25

### Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year unless otherwise noted)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Boilers B1 and B2	0.34 lb/MMBtu	0.34 lb/MMBtu	245 ton/yr 0.5 pounds per MMBtu			none	
Boiler B3	0.80 lb/MMBTU	0.80 lb/MMBTU	0.5 pounds per MMBtu			none	
Boiler B4	0.24 lb/MMBtu	0.24 lb/MMBtu	#2 fuel oil input of 516 kgal/month			0.08 lb/ MM Btu	
Presses WR -426,- 433, WRO-486, -487, -488,-489				No less than 75% overall control efficiency on a monthly basis			
Press WR-429				34550 tons per year VOC input with no less than 98% overall control efficiency & (PTE) <sup>3</sup>			
Press WRO-490				409.2 tons per rolling 12 month period VOC input with no less than 87% overall control efficiency			

Presses WRO-491 and WRO-492				No less than 98% overall control efficiency on an annual basis (PTE)			
Presses WRO-493 and WRO-494				no less than 98% overall control efficiency on an annual basis (PTE)			
Proof Press WCM-440				no less than 87% overall control efficiency			
Proof Press WCM-450				8.5 tons per month on a rolling 12 month average VOC input. No less than 98% overall control efficiency (PTE)			
Press WR-444 and Proof Press WCM-460				260 tons per month on a rolling 12 month average VOC input with no less than 93.4% <sup>1</sup> overall control efficiency			
Presses WR-441, WR-442, WR-443				789 tons per month VOC input, no less than 98% overall control on an annual basis (PTE)			
West Plant Cyclone WPC-1	16.5 lb/hr	16.5 lb/hr					
West Plant Cyclone WPC-2	15.1 lb/hr	15.1 lb/hr					
West Plant Concentrator WPCON-4	12.5 lb/hr	12.5 lb/hr					
West Plant Concentrator & Baghouse WPCON-3 & WPBH	3.53 lb/hr	3.53 lb/hr					
East Plant Cyclone EPC-1	12.69 lb/hr	12.69 lb/hr					
East Plant Cyclone EPC-2	2.22 lb/hr	2.22 lb/hr					
East Plant Cyclone & Baghouse EPC-3 & EPBH-C	10.72 lb/hr	10.72 lb/hr					

East Plant Concentrators & Baghouse EPCON-5, EPCON-6, & EPBH-E	3.1lb/hr	3.1 lb/hr					
East Plant Cyclone & Baghouse EPC-4 & EPBH-D	2.22 lb/hr	2.22 lb/hr					
Chrome Plating Tanks CRT-1 & CRT-2							(0.015 mg/dscm <sup>3</sup> )

- assuming a 90% solvent recovery efficiency and 3.4% solvent retained in substrate
- <sup>2</sup> equivalent to  $6.6 \times 10^{-6}$  gr/dscf
- <sup>3</sup> PTE (permanent total enclosure) indicates 100% capture efficiency

### County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Kosciusko County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]
  - (1) The provisions of New Source Performance Standards (NSPS), 40 CFR Part 60, Subpart A, shall apply to any of the following facilities subject to an NSPS except when otherwise specified in the other applicable NSPS.
  - (2) The provisions of New Source Performance Standards (NSPS), 40 CFR Part 60, Subpart A, does not apply to proof presses which are specifically exempted from 40 CFR 60.430 through 60.435, Subpart QQ, New Source Performance Standards for Graphic Arts Industry; Publication Rotogravure Printing. Therefore, proof presses WCM-440, WCM-450, and WCM-460 are not subject to the rule.
- (b) 40 CFR 60, Subpart Dc
  - (1) Boilers B1, B2, and B3 are not subject to the requirements of this NSPS, because they were constructed before the applicability date of the rule (June 9, 1989).
  - (2) Boiler B4 has a capacity greater than 10 MMBtu per hour and was constructed after the applicability date of June 9, 1989, therefore, it is subject to this NSPS. Pursuant to this rule, the sulfur dioxide emissions from boiler B4 shall be limited to 0.5 pounds per million Btu of heat input. Boiler B4 shall be deemed in compliance with this rule when using either natural gas or No. 2 distillate fuel oil containing not

in excess of 0.5% sulfur. No gases discharged from Boiler B4 shall exhibit greater than 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity.

- (c) 40 CFR 60, Subpart K
  - (1) Storage tanks TF-6, TF-7, TF-8, TF-14, TF-15, TF-16, EPIR-2, EPIR-3, RECSOL-1, RECSOL-2, and RECSOL-3 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110a through 60.113a, Subpart Ka), because of the following:
    - (a) TF-6, TF-7, TF-8, RECSOL-1, RECSOL-2, and RECSOL-3 are used to store RECSOL 9015 which is not a volatile or petroleum liquid. Therefore, they are exempt from that rule.
    - (b) TF-14, TF-15, TF-16, EPIR-2, and EPIR-3 have capacities less than 10,567 gallons. Therefore, they are exempt from the rule.
  - (2) The storage tanks TF-6, TF-7, TF-8, TF-14, TF-15, TF-16, EPIR-2, EPIR-3, RECSOL-1, RECSOL-2, and RECSOL-3 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Kb), because they were constructed prior to 1984.
  - (3) Storage tank FOS-1 is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart K), because
    - (a) it was constructed prior to 1984, and, therefore is exempt from Kb, and
    - (b) it has a capacity less than 40,000 gallons of No. 2 or No. 6 fuel oils which are specifically exempted from the definition of petroleum liquids and, therefore, it is exempt from Subpart Ka.
  - (4) Storage tank FOS-2 is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart K), because,
    - (a) it was constructed prior to 1984, and, therefore is exempt from Subpart Kb, and
    - (b) although it is used to store petroleum liquids, it has less than a 10,567 gallon capacity, it is exempt from Subpart Ka.
  - (5) Storage tanks EPIR-1, SRSP-1, SRSP-2, SRSP-3, DA-2, SRCON-1, SRSOL-1, SRDEC-1, and SRDEC-2 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Ka), because
    - (a) they were constructed prior to 1984, and, therefore are exempt from Subpart Kb, and
    - (b) they are not used to store petroleum liquids in capacities greater than 40,000 gallons, and, therefore are exempt from Subpart Ka.
  - (6) Storage tanks SRSP-4, SRSP-5, DA-1, SRCON-2, SRSOL-2, SRDEC-3, and SRDEC-4 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart K), because
    - (a) their storage capacities are less than 40 cubic meters (10,566.80 gallons), and, therefore, they are exempt from Subpart Kb, and
    - (b) they were constructed after 1984, so are exempt from Subpart Ka.
- (d) 40 CFR 60, Subpart QQ

- (1) Rotogravure presses WRO-486, WRO-487, WRO-488, and WRO-489 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430 through 60.435, Subpart QQ), because they were constructed before the applicability date of the rule (October 28, 1980).
  - (2) Proof presses WCM-440, WCM-450, and WCM-460 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430 through 60.435, Subpart QQ) because proof presses are specifically exempted from that rule.
  - (3) Rotogravure presses WR-429, WR-441, WR-442, WR-443, WR-444, WRO-490, WRO-491, WRO-492, WRO-493, and WRO-494 were constructed after the applicability date of October 28, 1980, and are not proof presses, and, therefore, are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430 through 60.435, Subpart QQ). Pursuant to this rule, emissions of volatile organic compounds (VOC) from these facilities shall not be equal to more than 16 percent of the total mass of VOC solvent and water used during any one performance averaging period.
- (e) 40 CFR 63, Subpart N, and 326 IAC 20-1-1  
The chromium electroplating operations are located at a source which performs decorative or hard chrome electroplating, and, therefore, are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63, Subpart N, and 326 IAC 20-1-1). Pursuant to 40 CFR 63, Subpart N, and 326 IAC 20-8-1, the chromium electroplating operations are subject to the following conditions:
- (1) The concentration of total chromium in the exhaust gas stream discharged to the atmosphere shall not exceed 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm) of ventilation air ( $6.6 \times 10^{-6}$  grains per dry standard cubic foot [gr/dscf]).
  - (2) A summary report shall be prepared to document the ongoing compliance status of the chromium electroplating operation. This report shall be completed annually, retained on site, and made available to IDEM upon request. If there are significant exceedances of chromium air emission limits (as defined in 40 CFR Part 63.347(h)(2)), then semiannual reports shall be submitted to:  
  
Indiana Department of Environmental Management  
Air Compliance Branch, Office of Air Quality  
Chromium Electroplating  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206
  - (3) The chromium electroplating operations shall be subject to the record keeping and reporting requirements as indicated in the chromium electroplating NESHAP.
- (f) 40 CFR 63, Subpart T  
The gravure cylinder wash machine, the gravure press parts washer, and the gravure cylinder making cleaning machine are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63, Subpart T and 326 IAC 20-6-1) because they do not use halogenated solvents.
- (g) 40 CFR 63, Subpart KK  
This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63, Subpart KK, and 326 IAC 20-18-1) because it is a major source of HAPs at which publication rotogravure, product and packaging rotogravure,

or wide web flexographic printing presses are operating. Pursuant to 40 CFR 63, Subpart KK, and 326 IAC 20-18-1, the publication rotogravure presses, rotogravure proof presses, cylinder and parts cleaners, ink and solvent mixing equipment, storage equipment, and solvent recovery equipment are subject to the following conditions, effective May 30, 1999:

- (1) The emissions of organic HAPs shall be limited to no more than eight percent (8%) of the total volatile matter used each month. Compliance with this standard shall be demonstrated by the methods detailed in 40 CFR 63.824 (b)(1).
- (2) The publication rotogravure printing operations shall be subject to the record keeping and reporting requirements as indicated in the printing and publishing NESHAP.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compounds. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

##### **326 IAC 5-1 (Visible Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### **State Rule Applicability - Individual Facilities**

##### **326 IAC 2-2 and 40 CFR 52.21(PSD Synthetic Minor Limit)**

This source is a major PSD source and the following presses have VOC limits such that PSD rules, 326 IAC 2-2 and 40 CFR 52.21, shall not apply:

- (a) for rotogravure press WR-429;
  - (1) rolling 12 month average of 34550 ton per year VOC input (691 ton/yr VOC emissions).

[Proof Press 429 was originally constructed prior to PSD and BACT rules, but as part of CP 085-6372, the source enclosed the press in order to lower emissions by 82.9 tons per year. This, along with other changes, allowed the source to net out of PSD applicability for the construction of presses WCM-460, WR-441, WR-442, and WR-443. Therefore, this limit is necessary so that PSD requirements do not apply.]

- (b) for rotogravure press WRO-490;
  - (1) rolling 12 month average of 4910 ton per year VOC input (53.2 tons VOC emissions per month), and

- (2) monthly solvent recovery overall efficiency of no less than 87%.

[These limits were established in PC (43) 1775. The source netted out of PSD applicability

by applying the use of control to WRO-490, and shutting down two existing presses, WR-424 and WR-491. Therefore, this limit is necessary so that PSD requirements do not apply.]

- (c) for rotogravure presses WR-441, WR-442, and WR-443;
  - (1) rolling 12 month average of no greater than 789 ton per month VOC input, and
  - (2) rolling 12 month average of no less than 98% absorber efficiency, and
  - (3) PTE (100% capture).[These limits were established pursuant to CP 085-6372, in which, through adding control and enclosure to previously existing equipment and, thereby, lowering emissions, the source was able construct these presses and to net out of PSD applicability.]
- (d) for rotogravure press WR-444 and proof press WCM-460;
  - (1) rolling 12 month average of 260 ton per month VOC input.[This limit was established in permit CP 085-6372, in which, through adding control and enclosure to previously existing equipment and, thereby, lowering emissions, the source was able construct these presses and to net out of PSD applicability.]
- (e) for the parts and cylinder washers, WGPW and WCWM:
  - (1) monthly rolling average of 500 tons of VOC input per 12 consecutive months.  
When operating the carbon adsorption system to achieve this limit, the carbon adsorption system shall maintain an overall control efficiency of 98% per 12 month period, rolled on a monthly basis.
  - (2) In the event that the carbon adsorption system is not operating, the amount of VOC input to the parts and cylinder washers shall be limited such that the VOC input with the carbon adsorption system operating times 0.02 added to the VOC input with the carbon adsorption system not operating shall not exceed VOC emissions of ten (10) tons per twelve (12) consecutive month period, rolled on a monthly basis.[This limit was established in order to limit VOC/HAP emissions to less than 10 tons per year, so that PSD requirements do not apply.]

#### 326 IAC 2-2 and 40 CFR 52.21 (PSD BACT Limitations)

Pursuant to 326 IAC 2-2 and 40 CFR 52.21 (PSD BACT Limitations), the specific facilities have the following limitations:

- (a) for proof press WCM-450;
  - (1) no greater than 8.5 tons per month volatile organic solvents input limit, and
  - (2) PTE (100% capture).

#### VOC Control Requirement

Rotogravure presses, WRO-486, WRO-487, WRO-488, WRO-489 were constructed prior to the applicability date June 19, 1978, of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements. Pursuant to the Construction Permit for Press WR-429, some of the emissions reductions obtained by adding control to these presses were used to net out of later PSD requirements. Therefore, for rotogravure presses WRO-486 and WRO-487 shall have a ducted capture system to the solvent recovery system with total control efficiency of no less than 75% on a monthly basis.

#### 326 IAC 2-4.1-1

The parts and cylinder washers are excluded from the applicability of the New Source Toxics Control regulation, because they are subject to the Printing and Publishing NESHAP, 40 CFR 63,

Subpart KK.

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

Boilers B1, B2, and B3 are subject to this rule. Particulate matter emissions from these boilers shall be limited to 0.8, 0.34, and 0.34 lb/MMBtu by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input;  
 C = maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) for a period not to exceed a sixty (60) minute time period;  
 Q = total source maximum operating capacity rating in million Btu per hour (MMBTU/hr) heat input;  
 N = number of stacks in fuel burning operation;  
 a = plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBTU/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBTU/hr heat input; and  
 h = stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to CP 085-3117-00009, issued on December 10, 1993, Boiler B4 is subject to this rule. Particulate matter emissions from this boiler shall be limited to 0.24 lb/MM Btu by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where Pt = pounds of particulate matter emitted per million Btu (lb/MMBTU) heat input; and  
 Q = total source maximum operating capacity rating in million Btu per hour (MMBTU/hr) heat input.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the pneumatic paper dust and trim collection systems shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Emission Unit	Allowable Limit (lb/hr)
WPC-1	16.5
WPC-2	15.1

WPCON-3 & WPBH	3.53
WPCON-4	12.5
EPC-1	12.69
EPC-2	2.22
EPC-3 & EPBH-C	10.72
EPCON-5, EPCON-6, & EPBH-E	3.10
EPC-4 & EPBH-D	2.22

The cyclones and baghouses shall be in operation at all times the pneumatic paper dust and trim collection systems are in operation, in order to comply with these limits. The cyclones are not pollution control devices, their purpose is to transfer paper while reducing the volume of air processed, in effect concentrating the paper to air ratio. The East Plant Baghouses EPBH-C, D, and E would be considered control devices on the pneumatic paper handling system, however, when excluding the cyclones, the baghouses would have a potential to emit of less than 10 pounds per hour. Therefore, the compliance monitoring has been reduced to weekly visible emissions notations instead of daily.

#### 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

The boilers B1 through B4 are subject to this rule. Sulfur dioxide emissions from these boilers shall be limited to five-tenths (0.5) pound per million Btu for distillate oil combustion or one and six-tenths (1.6) for residual oil combustion.

#### 326 IAC 8-3 (Organic Solvent Degreasing Operations)

The gravure cylinder wash machines, GCW and WCWM, and the gravure press parts washers, GPW and WGPW, are subject to this rule because they are cold cleaners. GCW, WCWM, and GPW are not subject to 326 IAC 8-3-5 because they do not have remote solvent reservoirs. Pursuant to 326 IAC 8-3-2, the owner or operator of these cold cleaning facilities shall:

- (a) equip each cleaner with a cover,
- (b) equip each cleaner with a facility for draining cleaned parts,
- (c) close the degreaser cover whenever parts are not being handled in the cleaner,
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases,
- (e) provide a permanent, conspicuous label summarizing the operating requirements, and
- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### 326 IAC 8-5-5 (Graphic Arts Operations)

The publication rotogravure presses are subject to this rule. These presses shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system of seventy-five percent (75%). These presses shall comply with this rule by using a ducted solvent capture system in conjunction with a carbon adsorption solvent recovery system having overall control efficiencies ranging from seventy-five to ninety-eight (75% - 98%) percent.

#### 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The storage tanks are not subject to this rule because they are not located in Clark, Floyd, Lake, or Porter Counties.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The boilers have applicable compliance monitoring conditions as specified below:
  - (1) The permittee will conduct one visible emission notation during normal operations each period when the boilers are burning No. 2 or No. 6 fuel oil, but no less than once per week. A trained employee or other trained observer shall record whether emissions are normal or abnormal.
  - (2) For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
  - (3) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
  - (4) A trained employee is an employee who has been trained in the appearance and characteristics of normal visible emissions for that specific process.
  - (5) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions are necessary because the boilers must operate properly to ensure compliance with 326 IAC 6-2-3, 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) and 326 IAC 2-7 (Part 70).

- (b) The carbon adsorption solvent recovery system and the ducted solvent capture system for the parts and cylinder washers have applicable compliance monitoring conditions as specified below:
  - (1) At all times that the carbon adsorption control system for the parts and cylinder washers is in operation and being utilized to demonstrate compliance of the affected source:
    - (A) Performing a liquid-liquid material balance for each month; or

- (B) Using continuous emission monitors, conducting an initial performance test of capture efficiency, and continuously monitoring a site specific operating parameter to assure the capture efficiency as specified in 40 CFR Part 63.824(b)(1)(ii).
  - (2) At all times that the carbon adsorption control system for the parts and cylinder washers is in operation and being utilized to demonstrate compliance with the VOC emission limitations, the control system shall be monitored using the inlet and outlet analyzers on the carbon adsorption system and monitoring the pressure differential in the enclosure to meet permanent total enclosure requirements.
  - (3) An inspection shall be performed each calendar quarter of the carbon adsorption unit controlling the parts and cylinder washers. All defective beds shall be repaired or replaced. The Permittee is not required to shut down the system in order to conduct the quarterly inspection. The Permittee shall monitor and inspect the carbon adsorption solvent recovery system and the ducted solvent capture system to ensure proper operation and maintenance.
  - (4) In the event that a failure on the carbon adsorber controlling the parts and cylinder washers has been observed, the affected compartments will be shut down immediately until the failed units have been repaired or replaced.
- (c) The carbon adsorption solvent recovery system and the ducted solvent capture system for the printing presses have applicable compliance monitoring conditions as specified below:
- (1) Performing a liquid-liquid material balance for each month; or
  - (2) Using continuous emission monitors that comply with the performance specifications 8 or 9 of 40 CFR 60, appendices B and F. In conducting the quarterly audits required by appendix F, the Permittee must challenge the monitors with compounds representative of the gaseous emission stream being controlled.
  - (3) If the Permittee chooses to comply with 40 CFR 63.824 through continuous emission monitoring of the carbon adsorption solvent recovery system and the ducted solvent capture system, he/she shall install, calibrate, operate, and maintain continuous emission monitors to measure the total organic volatile matter concentration at the inlets of the ducted solvent system and the outlets of the carbon adsorption solvent recovery system.
  - (4) If the Permittee chooses to comply with §63.824 through the use of the carbon adsorption solvent recovery system and the ducted solvent capture system and demonstrating continuous compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, he/she shall:
    - (A) Submit to IDEM, OAQ at the address listed in Section C - General Reporting Requirements with the compliance status report required by §63.9(h), a plan that:
      - (i) Identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained;
      - (ii) Discusses why this parameter is appropriate for demonstrating ongoing compliance, and
      - (iii) Identifies the specific monitoring procedures.

- (B) Set the operating parameter value, or range of values, that demonstrate compliance with the applicable emission standard of §63.824.
  - (C) Conduct monitoring in accordance with the plan submitted to IDEM, OAQ, unless comments received from IDEM, OAQ require an alternate monitoring scheme.
- (5) Any excursion from the required operating parameters which are monitored in accordance with Condition D.2.8(a),(b), or (c), unless otherwise excused, shall be considered a violation of the applicable emission standard.

These monitoring conditions are necessary because the carbon adsorption solvent recovery system and the ducted solvent capture system must operate properly to ensure compliance with 326 IAC 8-5-5 (Graphic Arts Operations), 326 IAC 2-2 (Prevention of Significant Deterioration), NSPS Subpart QQ (Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing), NESHAP Subpart KK (National Emission Standards for the Printing and Publishing Industry), and 326 IAC 2-7 (Part 70).

- (c) The composite mesh pad system has applicable compliance monitoring conditions as specified below:
- (1) The Permittee shall monitor and record the pressure drop across the composite mesh pad system once each day that CRT-1 and/or CRT-2 are in operation.
  - (2) The composite mesh pad system shall be operated within 1 inch of water column of the pressure drop value established during the most recent performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests that may be conducted in the future.

These monitoring conditions are necessary because the composite mesh pad system must operate properly to ensure compliance with NESHAP Subpart N (National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks) and 326 IAC 2-7 (Part 70).

- (d) The pneumatic paper dust and trim collection systems have applicable compliance monitoring conditions as specified below:
- (1) Weekly visible emission notations of the pneumatic paper dust and trim collection systems stack exhausts, from WPC-1, WPC-2, WPCON-4, EPC-1, EPC-3 & EPBH-C, shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee or other trained observer shall record whether emissions are normal or abnormal.
  - (2) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
  - (3) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
  - (4) A trained employee is an employee who has been trained in the appearance and characteristics of normal visible emissions for that specific process.
  - (5) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

- (6) An inspection shall be performed monthly and shall consist of:
  - (a) Checking if the pressure differential is within acceptable range,
  - (b) Confirm the filter blast operation for each baghouse,
  - (c) Confirm the corner/eye blast operation for each baghouse,
  - (d) Check for compressed air leaks,
  - (e) Complete a visual emission notation as listed in items (1) through (4) above.

Inspections are optional when venting to the indoors. All defective bags shall be replaced as soon as possible following detection, as prescribed in the preventive maintenance plan required by Condition D.4.2 and as required by Condition D.4.7.

- (g) In the event that bag failure has been observed:
  - (1) Within eight (8) hours of the determination of failure, response steps including a timetable for completion shall be devised.

These monitoring conditions are necessary because the pneumatic paper dust and trim collection systems must operate properly to ensure compliance with 326 IAC 6-3-2 (Process Operations: Particulate Matter Emission Limitations) and 326 IAC 2-7 (Part 70).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) Part 70 Application Form GSD-08.

This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

### **Conclusion**

The operation of this publication rotogravure printing shall be subject to the conditions of the attached proposed **Part 70 Permit No. T085-6040-00009**.